

# **APPENDIX O**

## ***Seawall BE Memo***



# Memorandum

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**To:** Mission Beach Seawall, Project Team  
**From:** Nicole Frank, MSHP, Architectural Historian  
**Subject:** Mission Beach Seawall  
**Date:** Updated on September 5, 2025  
**cc:** Matthew Valerio, Project Manager, Dudek

## 1 Introduction

Dudek's built environment staff prepared this memorandum in support of the Mission Bay Park Improvements Program (the Program) located in the City of San Diego, California. It provides a summary of the efforts conducted between 2021 and 2025 to document the Mission Beach Seawall, which is a CEQA historical resource, provide information for project planning considerations, specifically pertaining to conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (SOIS), and has been updated to provide detailed impacts analysis for inclusion in the Mission Bay Park Improvements Program Environmental Impact Report (PEIR).

The Mission Beach Seawall comprises a bulkhead, concrete walkway, and lamp posts. The seawall is a previously identified historical resource under the California Environmental Quality Act (CEQA). While the remaining sections of the seawall retain original components and character-defining features, several sections have been completely replaced or are in poor condition. The seawall has three periods of construction: 1925, 1928, and 1968 (see Figure 1). Between 1989 and 2006, portions of the 1928 concrete walkway and bulkhead were modified. In 2016, the entire 0.3-mile long original 1925 section was restored to its original appearance. Previous changes found to be in conformance with the SOIS include the complete replacement of the original material, installation of lamp posts that did not replicate historic designs, and new configurations of the bulkhead to accommodate beach access.

## 2 Documentation Background and Purpose

This memorandum has been refined and updated as part of the project planning process starting on September 1, 2021, updated on June 6, 2025, and updated in this final version on September 5, 2025. The September 2021 memorandum was submitted to the City of San Diego and included a summary of research and fieldwork findings; a timeline of development; a delineation of sections that contribute to the previously established significance; and a summary of records search results. The memorandum also clarified how the seawall has been altered and changed over time.

The initial purpose of the September 2021 memorandum was to inform the project team on how to remain in conformance with the SOIS as project plans were developed pertaining to the CEQA historical resource, the

Mission Beach Seawall. The goal as part of project planning was to meet SOIS conformance thresholds so that a CEQA finding of Less-than-Significant for historical resources would be possible. Recommendations included that replaced features and materials should be compatible with the historic features of the seawall. New designs may retain or replace substantially altered or non-original components. Plans should retain the features of the seawall that contribute to its significance for its association with the early development of Mission Beach (1914-1915); its integral part in the award-winning Mission Beach Subdivision Plan; and its period and method of construction utilizing tongue and groove pilings, which were unique and innovative for their time. Additionally, a list of historic features was developed to help guide SOIS conformance that contributes to the significance of the historical resource:

- Location along Ocean Front Walk running parallel to the Pacific Ocean
- Board form concrete using tongue and groove pilings
- Generally solid wall with low profile, allowing pedestrians and homeowners to view the beach
- Uniform light grey color
- Sharp rectangular reliefs evenly spaced out on each panel
- Rectangular scuppers that allow water to drain from the boardwalk

At the time of the September 2021 memorandum, no designs and no specific program had been determined for the Mission Beach Seawall as it was in the early planning phases.

All work to date has been overseen by Dudek Architectural Historian Nicole Frank, MSHP, who also conducted an intensive survey of the seawall on July 20, 2021. The survey entailed walking the length of the seawall, documenting with notes and photographs, specifically noting character-defining features, spatial relationships, and observed alterations. The September 2021 memorandum was reviewed by Dudek Senior Architectural Historian, Allison Lyons, MSHP and Sarah Corder, MSHP, Built Environment Lead.

The memorandum was first updated on June 6, 2025. The purpose of this update was to clarify the historic boundaries of the Mission Beach Seawall. The second and final update was on September 5, 2025. To prepare this memorandum, Dudek conducted preliminary research on the development of the seawall and reviewed previously prepared environmental review documents sent to Dudek by the City of San Diego (listed in Section 7 Works Cited at the end of this memorandum). This updated document includes the finalized project description and provides a detailed impacts analysis that was used in Section 4.6 Historical Resources of the PEIR. The memorandum has additionally been reviewed by Dudek Senior Architectural Historians Patricia Ambacher, MA, and Kathryn Haley, MA. All Dudek staff who have worked on this document meet the Secretary of the Interior's Professional Qualification Standards for architectural history.

### 3 Project Description

The proposed Program is intended to address issues related to water quality and water circulation, habitat, and visitor-serving improvements in specifically identified areas. The Program would include implementation of the following elements: Wetland and Water Quality Improvements Element, Shoreline Restoration Element, Upland Habitat and Preserve Expansion Element, Bicycle and Pedestrian Improvements Element, Restoration of Seawall

Bulkhead Element, and Deferred Maintenance Activities Element. A Preliminary Engineering Report (PER) prepared up to 30% complete designs for each of these location-specific elements.

Certain proposed improvements in the Improvement Zone are in areas that are the subject of the Mission Bay Park Master Plan revisions, specifically for Fiesta Island and DeAnza Cove. The Rose Creek element is not a part of the improvements at this time because the planning process for DeAnza Cove is underway and occurring separately from this effort. The California Coastal Commission Modifications to the Fiesta Island Mission Bay Park Master Plan Amendment were approved by the City of San Diego (City) City Council in 2021, and elements herein on Fiesta Island are designed and evaluated in relation to that amendment and the current Mission Bay Park Master Plan (2024).

## **Restoration of the Seawall Bulkhead Element**

### ***Location***

The Restoration of the Seawall Bulkhead Element is located along Mission Beach Boardwalk. Two segments of the existing seawall would be replaced. The first segment (A) starts at the intersection of Balboa Court and continues up to San Fernando Place. The second segment (B) starts at the intersection of Ventura Place and continues up to Pacific Beach Drive. Improvements to existing beach access points at various locations along segments A and B would also be provided as either replacement stairways or ADA ramps, and one new vehicular access for City use would be created at Thomas Avenue. In addition, a new 375-foot-long segment (C) would be constructed from the north end of the existing seawall at Thomas Avenue toward Crystal Pier. See Figures 3-24 and 3-25 for the location of this element.

### ***Description***

The Restoration of the Seawall Bulkhead element consists of replacement of approximately 9,780 linear feet of the existing seawall along Mission Beach Boardwalk, extension of the seawall by approximately 375 feet northwards to Crystal Pier, improve up to 14 existing beach access locations with stairways or ADA ramps, and potentially create one new (City) vehicular access to the beach at Thomas Avenue. The Preliminary Engineering Report Mission Beach Seawall Improvements Feasibility Study, Moffatt & Nichol, May 2024, provides detailed preliminary design and construction approach information (Appendix H). The term “restoration” in this case is derived from the City Charter Section 55.2, and is intended to refer to the replacement, and extension of portions of the existing historic resource, the Mission Beach Seawall, to continue to maintain and improve the seawall and its functions in general keeping with the existing and more recently restored segment(s). The word “restoration” in this case is not intended to be used as it is defined by the Secretary of Interior’s Standards for the Treatment of Historic Properties: Restoration as a Treatment and Standards for Restoration (Grimmer 2017).

### **Replacement Segments A and B**

The 9,780 linear feet is broken up into two segments (Segments A and B) (see Figure 3-24). Segment A is approximately 8,760 feet long, sections of which were constructed in 1925, 1928, and 1986. The existing parapet height ranges from approximately 30 to 36 inches, which would be replaced, and the height increased to a new consistent parapet height of 42 inches (an increase of 6 to 12 inches). This additional height is necessary to provide required fall height protection and resilience from 6 to 12 inches of sea level rise.

Segment B is approximately 1,020 feet in length and was constructed in 2000 with a parapet height of 36 inches. As with Segment A, the parapet would be replaced to a new height of 42 inches, an increase of 6 inches. This additional height is necessary to provide required fall height protection and would provide resilience to 6 inches of SLR.

For both segments, the existing wall would be demolished to the top of the concrete pile cap. The new wall would be placed and connected to the existing pile cap through vertical reinforcing bars.

The wall segments would be formed with reveals to meet the architectural features required for historical preservation and would be color-matched with the previous improvements, as required by the historic preservation requirements in the San Diego Municipal Code. The modified replacement-in-kind design would tie in with the overall look of the Mission Beach Boardwalk. No work is required on the walkway for the parapet replacement, so only portions of the boardwalk would require fencing during construction. However, there are voids identified beneath the existing boardwalk that would be filled as part of this element by creating core holes in the sidewalk and inserting grout, necessitating partial sidewalk/boardwalk closures during construction activities.

### New Segment C

A new segment (Segment C) would be constructed where the current k-rail separates the beach from the boardwalk from the end of Thomas Avenue, northwards approximately 375 feet to Grand Avenue/Crystal Pier (see Figure 3-25). The existing 13-foot-wide Segment C boardwalk is proposed to be widened by 5 feet to a total width of approximately 18 feet. At the north end of Segment C, the new wall would tie in at the front edge of the existing flatwork for the shower near the lifeguard station. The added width would provide congestion relief in this heavily trafficked pedestrian area. Consistent with the replacement segments (A and B), the new wall would have a parapet height of 42 inches (3 feet, 6 inches). The new wall would be supported on a spread footing or a deep pile foundation to improve existing conditions for safety.

In order for the new wall segment to remain stable, the City would have to maintain a minimum sand elevation, similar to a requirement of the 2015 Belmont Park project, which was used as guidance for this study. The City would likely need to continue constructing sand berms each winter season to maintain this sand level.

### Access Improvements

Pedestrian beach access along Segments A and B is currently provided by “pop-out” stairways at 14 locations (see Figure 3-24). These existing stairways were constructed at different times with varied configurations along the boardwalk. Replacement of these stairs would be achieved with either new code-compliant stairs or an ADA access ramp.

#### *Stairs*

The existing sheet piles supporting the stairs are assumed to be concrete in Segment A and steel in Segment B and could remain in place to support the new stairs. The stairs would rise 2 feet before descending to match the existing configuration. At the end of the stairway, an “L”-shaped segment of new sheet pile wall with a concrete cap would be constructed to lengthen the stairway to meet code requirements. The proposed stairs would descend to approximately EL 7.00 (NGVD 29) to match the elevation of the bottom of the existing stairs.

### *ADA Ramps*

The ADA-compliant pedestrian ramp (Figure 3-26) that would replace some of the existing beach access stairs at locations determined by the City would slope at 1:13 (7.69%) maximum and provide landings for every 30-inch rise per the City of San Diego 2021 Standard Drawing SDM-115. The ramp would also have a picket guardrail with a handrail for fall protection. The proposed ramp would rise 2 feet before descending to provide the same level of coastal protection currently provided.

The proposed bottom landing would be approximately 3 feet below the top of the boardwalk. This is assumed to be near the same elevation where the current stairs terminate and is the lowest the ramp can descend before requiring an additional landing.

### *New Vehicular Access*

A 75-foot-long driveway is proposed at Thomas Avenue that would provide beach access for City equipment. The driveway would be 16 feet wide. The driveway would be constructed parallel to the existing boardwalk at the north end of Segment B. The driveway would descend to approximately elevation 1.0 (NGVD29). Because there is currently no shoreline protection provided, the driveway does not need to rise 2 feet before descending (as required for the pedestrian beach access locations).

### *Construction*

#### **Replacement (Segments A and B)**

Phasing is included by the length of wall section based on the nature of the work required.

#### **New Seawall (Segment C)**

Construction of the new wall (Segment C) would require closing the boardwalk to provide the necessary clearance for wall footing excavation. The adjacent parking lot could be used as a temporary pedestrian traffic detour during construction (Figure 3-27 through 3-32). The duration of construction is estimated to be approximately 3 months.

#### **Access Improvements**

Each existing beach access location would be closed during the construction of replacement stairs; however, the boardwalk could remain partially open. The existing parapet along the stair pop-out would be demolished and reconstructed. The new stairs would tie into the boardwalk parapet, and thus the replacement of the boardwalk parapet must occur prior to reconstruction of the stairs. Construction duration is estimated at 2 weeks for each stairway.

To construct the ADA ramp, a new sheet pile wall and pile cap would be constructed to extend the existing pop-out to the necessary length for the ramp. The new sheet pile wall for the stairway would tie into the existing sheet pile wall. The existing stairs would be demolished and replaced by the ADA ramp. The parapet along the existing segment of the stair pop-out would be demolished and replaced. The new ramp would tie into the boardwalk parapet; as such, the replacement of the boardwalk parapet must occur prior to the construction of the ramp. Aesthetically, the parapet wall for the ramp would be designed consistent with the new parapet wall proposed for the boardwalk.

The new vehicular driveway would be supported by two new steel sheet pile walls with concrete caps, which would run parallel to the existing seawall. A structural concrete slab would span between the sheet piles. On the beach side, a parapet would be constructed to provide consistency with other segments of the seawall. On the boardwalk side, a new parapet would be constructed on top of the existing seawall as part of the Segment B work. The new parapet on the existing seawall (Segment B) would not tie in directly with the driveway, meaning the driveway could be constructed before or after the Segment B work is completed.

#### *Operation and Maintenance*

Upon completion of the Restoration of the Seawall Bulkhead element, operation and maintenance activities would be minimal and consistent with the City's standard routine maintenance requirements.



### 3 Mission Beach Seawall – Construction and Alterations Timeline

1925: Initial construction, 0.3-miles long

1928: Extended 2.4 miles north from Ventura Place

1968: Extended 1.5 miles beginning at Balboa Court to the southern terminus of the seawall

1999: Entire existing bulkhead from Pacific Beach Drive to Thomas Avenue was removed and replaced

2005: Walkway between Liverpool Place and El Carmel removed and replaced

2006: Walkway between El Carmel Place and Nantaskey Court removed and replaced

2016: Walkway and seawall replaced from Ventura Place to San Fernando Place

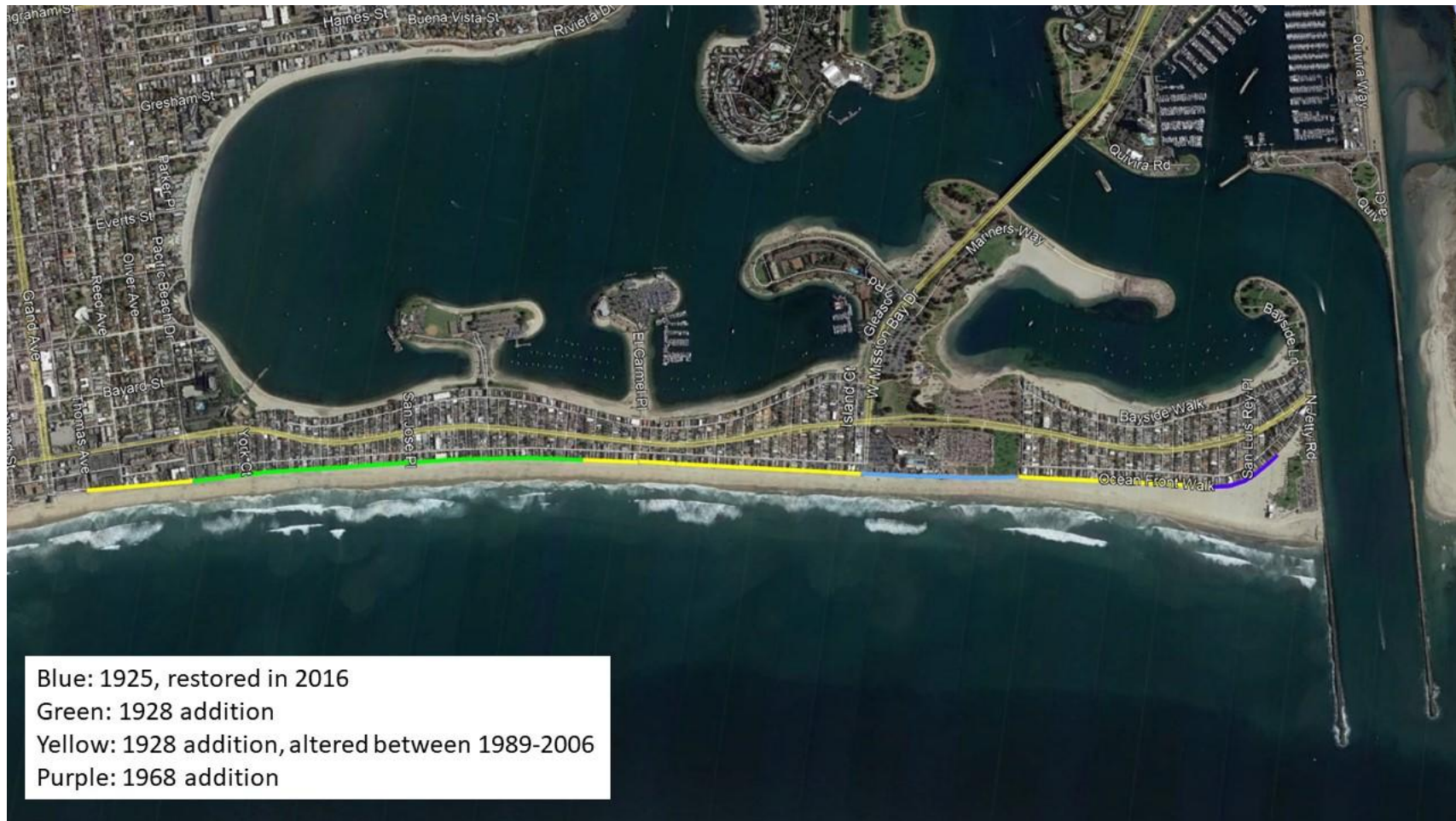


Figure 1. Aerial photo of the seawall with color-coded dates of construction and alterations (Google Earth 2020)



Figure 1: Integrated stairs originally provided access to the beach. Photo from section completed in 1928, appears in yellow on Figure 1. (July 2021, DSC03046).



Figure 2: In 2016, stairs were removed and beach access was modified with L-shaped openings in the seawall. Photo from section originally completed in 1925, appears in blue on Figure 1. (July 2021, DSC03046).

## 3.1 Mission Beach Seawall - Sections



Table 1: Mission Beach Seawall - Sections			
Section Date of Construction	Figure 1 Reference Color	Figure	Research Finding, Field Observation, Alterations
1925	Blue	<p>Figure 3</p>  <p>(July 2021, DSC03083)</p>	<p>Original section constructed in 1925, which coincided with the development of the Mission Beach Amusement Center (now Belmont Park). This section spanned 0.3-miles with the bulkhead comprised of precast reinforced concrete sheet pile walls interlocked continuously. In 2016, this section was restored to its original 1925 appearance, therefore it is entirely new and not of historic age.</p>
1928	Green	<p>Figure 4</p>  <p>(July 2021, DSC03067)</p>	<p>In 1928, three years after the seawall's initial construction, it was expanded north of Ventura Place and south of San Fernando Place. This section spanned approximately 2.5-miles with the bulkhead comprised of differently sized precast reinforced concrete sheet pile walls with a continuous interlock. Alterations to this section include informal maintenance such as patches and infill of cracks.</p>





Table 1: Mission Beach Seawall - Sections			
Section Date of Construction	Figure 1 Reference Color	Figure	Research Finding, Field Observation, Alterations
1928 Section altered in 1989	Yellow	<p>Figure 5</p>  <p>(July 2021, DSC03104)</p>	<p>This section is part of the 1928 expansion north of Ventura Place and south of San Fernando Place. In 1989, the concrete walkway was removed and replaced from San Fernando Place to Balboa Court. Alterations to this section include informal maintenance such as patches and infill of cracks.</p>
1928 Section altered in 1990	Yellow	<p>Figure 6</p>  <p>(July 2021, DSC03077)</p>	<p>This section is part of the 1928 expansion north of Ventura Place and south of San Fernando Place. In 1990, the walkway between Ventura Place and Liverpool Court was replaced. Alterations to this section include informal maintenance such as patches and infill of cracks.</p>





Table 1: Mission Beach Seawall - Sections			
Section Date of Construction	Figure 1 Reference Color	Figure	Research Finding, Field Observation, Alterations
1928 Section altered in 1999	Yellow	<p>Figure 7</p>  <p>(July 2021, DSC02978)</p>	This section is part of the 1928 expansion north of Ventura Place and south of San Fernando Place. In 1999, the entire existing bulkhead from Pacific Beach Drive to Thomas Avenue was removed and replaced; therefore, it is entirely new and not of historic age.
1928 Section altered in 2005	Yellow	<p>Figure 8</p>  <p>(July 2021, DSC03067)</p>	This section is part of the 1928 expansion north of Ventura Place and south of San Fernando Place. In 2005, the walkway between Liverpool Place and El Carmel was removed and replaced. Alterations to this section include informal maintenance such as patches and infill of cracks.

Table 1: Mission Beach Seawall - Sections			
Section Date of Construction	Figure 1 Reference Color	Figure	Research Finding, Field Observation, Alterations
1928 Section altered in 2006	Yellow	<p>Figure 9</p>  <p>(July 2021, DSC03062)</p>	<p>This section is part of the 1928 expansion north of Ventura Place and south of San Fernando Place. In 2006, the walkway between El Carmel Place and Nantasket Court was removed and replaced. Alterations to this section include informal maintenance such as patches and infill of cracks.</p>
1968 Section	Purple	<p>Figure 10</p>  <p>(July 2021, DSC03149)</p>	<p>Later addition to the seawall, constructed in 1968. This section spanned approximately 0.15 miles beginning at Balboa Court and acting as the southern terminus for the seawall. This section is comprised of a continuous reinforced concrete bulkhead that is backfilled with earthen fill.</p>

## 4 Records Search Results

Dudek submitted a record search request to the South Coastal Information Center (SCIC) at San Diego State University on June 15, 2021, for the seawall with no buffer. The results were provided on June 17, 2021.

### 4.1 Previous Technical Studies

The records search indicated that nine (9) previous studies have been performed within the project area. The project area for the records search was defined as strictly the Mission Beach Seawall, including the walkway and bulkhead, without a buffer. The reports are presented in Table 2 below.

Table 2: Previous Technical Studies			
Report I.D.	Title	Author	Year
SD-03541	Negative Archeological Survey Report for the Expansion of the Mission Beach Boardwalk, San Diego, California	Mary Robbins-Wade	1997
SD-03993	Crystal Pier	Various	N/A
SD-04800	Final Finding of Effect for the Mission Beach Boardwalk Expansion, San Diego, California	Milford Wayne Donaldson	1998
SD-05035	Historic Property Survey Report for the Expansion of the Mission Beach Boardwalk San Diego, California	Milford Wayne Donaldson	1997
SD-09353	Historical Assessment of Grand Pacific Beachfront Resort Project	Alexander D. Bevil	1998
SD-09599	Historical Nomination of the Maggie Irwin Becker Beach Cottage 706 Manhattan Court, Mission Beach San Diego, California	Ronald V. May and Dale Ballou May	2005
SD-10760	Report on the Belmont Amusement Park-Merry-Go-Round	Various	N/A
SD-10761	Mission Beach Belmont Park-Roller Coaster & Misc. Papers	Various	N/A
SD-11164	Cultural Resources Inventory for Phases II and IIB of Coastal Low Flow Storm Drain Diversion System, City of San Diego, California LDR#99-023	Andrew Pigniolo and Stephanie Murray	2002



## 4.2 Previously Identified Resources

The records search indicated that one (1) resource has been previously evaluated within the project area. The resource is presented in Table 3 below.

Table 3: Previously Identified Resources			
Primary No.	Other IDs	Attribute Code	Recorded By
P-37-016522	Mission Beach Seawall and Boardwalk	HP-39 (Other-seawall and boardwalk)	1997 (Milford Wayne Donaldson, Eileen Magno)

## 5 Evaluation

### 5.1 Summary of Previous Evaluations

The Mission Beach seawall (bulkhead and walkway or boardwalk) was previously evaluated for significance under National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) criteria by Milford Wayne Donaldson in 1997 and again in 2014 by IS Architecture. Donaldson found the 2.4-mile-long seawall eligible for listing in the NRHP and the CRHR under Criteria A/1, B/2, and C/3. IS Architecture found a 0.3-mile section of the seawall eligible for listing in the NRHP under Criteria A, B, and C. The 0.3-mile section of the seawall is bounded by Ventura Place to the north and San Fernando Place to the south. The two reports did not evaluate the seawall under City of San Diego designation criteria. On September 9, 1997, State Historic Preservation Officer (SHPO) Cheryl Widell concurred with two of the three criteria put forth by Donaldson's 1997 report. SHPO determined that the seawall is eligible for inclusion in the NRHP, at the level of local significance, under Criteria A and C. SHPO did not concur with Donaldson's recommendation for eligibility under Criterion B. The eligibility finding included the entire 2.4-mile-long length of the seawall from Thomas Avenue to the north and the South Mission Beach jetty to the south. The 2014 IS Architecture report stated, "IS Architecture concurs with the chosen National Register (NR) designation criteria as put forth by the City of San Diego Historic Resources staff," this included Criteria A, B, and C despite SHPO's 1997 determination of eligibility for only Criteria A and C. These evaluations are summarized in Table 4 below.

Table 4: Significance Criteria in Previous Evaluations			
	NRHP criteria	CRHR criteria	City of San Diego criteria
Milford Wayne Donaldson, 1997	A, B, and C	1, 2, and 3	Not evaluated
SHPO, 1997	A and C	No comment	No comment
IS Architecture, 2014	A, B, and C	Not evaluated	Not evaluated

### 5.2 Previous Evaluations and Studies of SOIS Conformance

#### Final Finding of Effect for the Mission Beach Boardwalk Expansion, San Diego, California

The initial evaluation of the Mission Beach seawall (bulkhead and walkway or boardwalk) for historical significance was completed by Milford Wayne Donaldson as part of the Final Finding of Effect for the Environmental Impact Review (EIR) of the Mission Beach Boardwalk Expansion, San Diego, California. This EIR was certified on June 15, 1998.

#### *NRHP/CRHR Criterion A/1*

The 1997 Milford Wayne Donaldson report found the entire 2.4-mile-long seawall eligible for listing under Criterion A/1. In 1997, SHPO concurred with this finding of eligibility under Criterion A/1. The seawall's eligibility under this criterion was based on its importance with events that have made a significant contribution to San Diego's history. The themes and reasons for historical significance identified in the 1997 report associated with this criterion included:

- The seawall complimenting the design elements associated with the Mission Beach Amusement Center.
- The seawall being part of the 1914-1915 Mission Beach Subdivision Plan, which was a winner of the prestigious Landscape Architectural Award in 1925.
- The seawall representing the longest uninterrupted protective structure on the Pacific Coast built during this time.
- The original 1925 and subsequent 1928 seawall extensions have retained a high degree of structural integrity.

*NRHP/CRHR Criterion B/2*

The 1997 Milford Wayne Donaldson report found the 2.4-mile-long seawall eligible for listing under Criterion B/2. The 1997 report stated that the seawall demonstrated a high level of integrity because of its association with the following noted persons:

- John D. Spreckels, Developer
- Lincoln Rodgers and F.W. Stevenson, Architects
- Wurster Construction Company, General Contractor

In 1997, SHPO did not concur with this finding of eligibility under NRHP Criterion B/2.

*NRHP/CRHR Criterion C/3*

The 1997 Milford Wayne Donaldson report found the entire 2.4-mile-long seawall eligible for listing under NRHP Criterion C/3. In 1997, SHPO concurred with this finding of eligibility under Criterion C/3. The seawall's eligibility under this criterion was based on both its period and method of construction. The themes identified in the 1997 report associated with this criterion included:

- The period and method of construction utilizing board form concrete consistent with the 1920s for the bulkhead and lower portion of the seawall.
- The design of the bulkhead using preformed tongue and groove pilings, providing a near water-tight joint, which was a unique and innovative design for their time.
- The wave deterrent was an innovation and during the 1920s was considered to be an expensive detail. Today, this design is a standard feature for modern seawalls.

SHPO also concurred with the 1997 report stating that the seawall maintained a high degree of structural integrity of design, setting, and materials associated with the historical period of significance (1914-1915).

*NRHP/CRHR Criterion D/4*

The 1997 Milford Wayne Donaldson report did not find the seawall eligible for listing under Criterion D/4. SHPO concurred with the 1997 report and did not find the seawall eligible for listing under Criterion D/4.

## Conclusion

The seawall was determined eligible for inclusion on the NRHP, at the level of local significance, under Criteria A/1 and C as defined in 36 CFR 60.4. The eligibility finding included a 2.4-mile-long seawall from Thomas Avenue to the north and the South Mission Beach jetty to the south. According to the SHPO,

Both the Mission Beach Boardwalk and the Seawall have strong associations with early development of the Mission Beach area during the area's historical period of significance (1914-1945) and were prime components of an award-winning landscape design by developer John D. Spreckels. In addition, the Mission Beach Boardwalk and the Seawall have maintained a high degree of the structural integrity of design, setting, and materials associated with the aforementioned historical period of significance.<sup>1</sup>

A mitigation measure specified that the original design would be used for repair and replacement. Donaldson concluded in a Finding of No Adverse Effect that all work would be done in accordance with the SOIS.<sup>2</sup> The work appears to have been completed in accordance with the SOIS.

### **Mission Beach Seawall and Boardwalk Integrity Study, Mission Beach Boardwalk, San Diego, CA (Harris & Associates 2012)**

This report was prepared by Harris & Associates in April 2012 in response to structural aspects of the *Mission Beach Boardwalk Bulkhead Preservation Planning Study* prepared by the City of San Diego in July 2006. The primary objectives of the Harris report were “to provide recommendations for the restoration of the Mission Beach Boardwalk, which was built circa 1925, 1928, and 1968 to comply with the standards of preservation of the historical elements.”<sup>3</sup> The Harris report divided the seawall into three components: the pile cap, the parapet wall, and the concrete walkway. The report then identified five priority phases for the restoration process of the three identified components. The report discussed the structural integrity of the parapet or bulkhead and did not evaluate the seawall or analyze its integrity as a historical resource.

### **Mission Beach Boardwalk Bulkhead: Historical Analysis/Assessment of Lampposts and Seawall (Stiegler and Crane 2014)**

This report was prepared by IS Architecture in November 2014 for the City of San Diego in support of the Mission Beach Boardwalk Bulkhead project plans to replace, in-kind, the existing bulkhead and walkway of the 0.3-mile section of the seawall spanning from Ventura Place to San Fernando Place. The report focused on two components of the project, the lamp posts and the evaluation of whether the proposed bulkhead openings would meet the SOIS.

## NRHP/CRHR Criterion A/1

The 2014 IS Architecture report found the 0.3-mile section of the seawall eligible for listing under Criterion A/1. The 2014 IS Architecture report did not conduct a full evaluation of NRHP criteria, but concluded the seawall was eligible under Criterion A/1 for its association with events that have made a significant contribution to the broad patterns of our history.

<sup>1</sup> Cheryl Widell, “Office of Historic Preservation, Department of Parks and Recreation, Letter FHWA970721A,” P-37-016522, September 9, 1997.

<sup>2</sup> Milford Wayne Donaldson, *Final Finding of Effect for the Mission Beach Boardwalk Expansion*, SD-04800, August 7, 1998,

<sup>3</sup> Harris & Associates, *Mission Beach Seawall and Boardwalk Integrity Study, Mission Beach Boardwalk, San Diego, CA*, April 20, 2012.

*NRHP/CRHR Criterion B/2*

The 2014 IS Architecture report did not conduct a full evaluation of NRHP criteria, but concluded the 0.3-mile section of the seawall was eligible under Criterion B/2 for its association with historically significant individuals.

*NRHP/CRHR Criterion C/3*

The 2014 IS Architecture report did not conduct a full evaluation under the NRHP criteria but concluded the 0.3-mile section of the seawall was eligible under NRHP Criterion C/3 for its period and method of construction.

*NRHP/CRHR Criterion D/4*

The 2014 IS Architecture report did not find the 0.3-mile section of the seawall eligible for listing under Criterion D/4.

*Conclusion*

IS Architecture found the proposed openings in the seawall's bulkhead did not conform with the SOIS and the existing lamp post fixtures were not of historic age. IS Architecture recommended the lamp posts be replaced to match the historic design.

**Mission Bay Seawall Replacement Feasibility Study, Mission Bay PEIR (Moffatt & Nichol 2019)**

This report was prepared by Moffatt & Nichol in April 2019 for Dudek to develop 30% design-level documents for the replacement of the aging seawall. As a precursor to the 30% design, the City of San Diego requested a concept study be developed that investigated two different replacement designs. The first concept was a replacement-in-kind design. The second design concept accounts for sea-level rise impacts. The results of this study indicate that of the two options, Option 1, Modified Replacement-in-Kind, had the lowest overall construction cost, the shortest construction duration, lower sightline concerns, and the simplest construction. This study did not include an evaluation for historical significance.

## 5.3 Dudek Findings

### NRHP/CRHR

*NRHP/CRHR Criterion A/1*

Dudek reviewed and synthesized all previous arguments as the following summary statement of significance under this criterion: The seawall is eligible for inclusion on the NRHP and CRHR under Criterion A/1 for its association with the early development of Mission Beach (1914-1915) and its integral part in the award-winning Mission Beach Subdivision Plan, which was honored for their innovation in beach resort planning. Additionally, the seawall retains integrity to be listed on the NRHP/CRHR under Criterion A/1.

*NRHP/CRHR Criterion B/2*

Dudek reviewed and synthesized all previous arguments as the following summary statement of significance under this criterion: The seawall is not eligible for inclusion on the NRHP and CRHR under Criterion B/2 for its association with historically significant individuals. The developer, John D. Spreckels was an important individual to the history of San Diego. Despite this, the seawall, as compared to the other properties associated with his productive life, does not appear to be the property that best illustrated his historic contributions and important achievements. The significance of the seawall architects, Lincoln Rodgers and F.W. Stevenson, and general

contractors, the Wurster Construction Company, is best evaluated under Criterion C/3 for their contributions to the design of the seawall. Therefore, the seawall does not appear eligible under NRHP/CRHR Criterion B/2.

#### *NRHP/CRHR Criterion C/3*

Dudek reviewed and synthesized all previous arguments as the following summary statement of significance under this criterion: The seawall is eligible for inclusion on the NRHP and CRHR under Criterion C/3 for its period and method of construction utilizing tongue and groove pilings, which were unique and innovative for their time. Additionally, the seawall retains integrity to be listed on the NRHP/CRHR under Criterion C/3.

#### *NRHP/CRHR Criterion D/4*

Dudek reviewed and synthesized all these arguments as the following summary statement of significance under this criterion: There is no evidence to indicate that the seawall is likely to yield any information important in prehistory or history. Additionally, the seawall is not associated with an archaeological site or a known subsurface cultural component. Therefore, it does not appear eligible under NRHP/CRHR Criterion D/4.

## City of San Diego

### *City of San Diego Historical Resources Board Designation Criteria*

For all of the reasons described above, the seawall appears eligible for listing as a historical resource by the City of San Diego Historical Resources Board (HRB) for meeting designation Criteria A, C, and E. These Criteria are as follows:

- A. exemplifies or reflects special elements of the City's, a community's, or a neighborhood's, historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping or architectural development;
- C. embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- E. is listed or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historical Preservation Office for listing on the State Register of Historical Resources

The seawall appears eligible under HRB Criteria A, C, and E due to the 1997 determination of eligibility by the SHPO. The SHPO found the seawall eligible for listing on the NRHP under Criteria A and C based on its importance with events that have made a significant contribution to San Diego's history and its period and method of construction. As the seawall has been determined eligible by the SHPO, it is eligible under HRB Criteria E.

## Character-Defining Features

Dudek identified the following as character-defining features of the seawall:

- Location along Ocean Front Walk running parallel to the Pacific Ocean
- Access to the beach from the boardwalk through integrated concrete stairs
- Board form concrete using tongue and groove pilings

- Generally solid low profile, allowing pedestrians and homeowners to view the beach
- Uniform light grey color
- Sharp rectangular reliefs evenly spaced out on each panel
- Rectangular scuppers that allow water to drain from the boardwalk

## Integrity

### Location

NRHP, CRHR, and HRB Criterion A/1/A: The seawall retains integrity of location under Criterion A/1/A. The seawall is situated in its original location where it was constructed and has not been moved. As such, it retains integrity in its location.

NRHP, CRHR, and HRB Criterion C/3/C: The seawall retains integrity of location under Criterion C/3/C. The seawall is situated in its original location where it was constructed and has not been moved. As such, it retains integrity in its location.

### Design

NRHP, CRHR, and HRB Criterion A/1/A: The seawall retains integrity of design under Criterion A/1. The seawall was constructed as part of the Mission Beach Subdivision Plan and retains its original function to allow pedestrian access to the beach and stop the intrusion of water onto the boardwalk. The conscious decisions made during the original planning of the seawall have been retained.

NRHP, CRHR, and HRB Criterion C/3/C: The seawall retains integrity of design under Criterion C/3/C. The seawall's organization of space, proportion, scale, technology, ornamentation, and materials have been retained. Despite sections of replacement materials, the seawall overall displays the same tongue and groove pilings, which made it unique and innovative for its time. Additionally, the seawall has remained utilitarian in function and design with a lack of ornament and the use of unpainted concrete. While design elements such as the innovative period technique of the tongue and groove piling in the bulkhead were replicated during repairs and replacement, the integrity of workmanship (discussed below) was diminished when these elements were replicated. Many features of the seawall are standard features for modern seawalls but when applied to the original period of construction (1925 and 1928), these features illustrate innovative design technology. The seawall continues to reflect its historic design technologies as well as aesthetics.

### Setting

NRHP, CRHR, and HRB Criterion A/1/A: The seawall retains integrity of setting under Criterion A/1/A. The seawall was originally constructed as an integral part of the 1914-1925 Mission Beach Subdivision Plan, which included the John D. Spreckels Amusement Center. Upon its initial construction, the Amusement Center was bounded by Ventura Place to the north and San Fernando Place to the south and included a bathhouse, dance casino, and concessions with the Pacific Ocean to the direct west. Despite the removal of the Amusement Center's key components including the bathhouse and dance casino, the seawall remains as an uninterrupted protective structure on the Pacific Coast. Additionally, the key spatial relationship between the seawall, Mission Beach, and the Pacific Ocean have been retained. NRHP, CRHR, and HRB Criterion C/3/C: The seawall retains integrity of

setting under Criterion C/3/C. The seawall continues to reflect the functions it was intended to serve as a seawall separating the ocean from the buildings along Ocean Front Walk. The seawall retains the essential features of its original physical environment which include the ocean, the beach, the boardwalk, and the buildings along the boardwalk. The retention of these elements allows the seawall to maintain its historic character while also retaining its historic role.

## **Materials**

NRHP, CRHR, and HRB Criterion A/1/A: The seawall does not retain integrity of materials under Criterion A/1/A. The physical elements that were combined during the seawall's initial construction in 1925 and 1928 as part of the Mission Beach Subdivision Plan have not been retained. Multiple alterations, including an extension in 1968, replacement of original materials during the 1990s and 2000s, a complete replacement of the original 1925 seawall in 2016, and the addition of non-original materials over time have affected the seawall's ability to reveal the preferences of those who created it.

NRHP, CRHR, and HRB Criterion C/3/C: The seawall does not retain integrity of materials under Criterion C/3/C. Despite the key exterior material of concrete being retained and the method of construction remaining the same from the seawall's initial period of construction the majority of the physical elements from that period have been altered or replaced. The seawall still reflects the tongue and groove pilings design, but the materials that were originally used to display that innovative design have been lost.

## **Workmanship**

NRHP, CRHR, and HRB Criterion A/1/A: The seawall does not retain integrity of workmanship under Criterion A/1/A. Similar to the integrity of materials, the physical evidence of an artisans' labor and skill in constructing the seawall as part of the Mission Beach Subdivision Plan have not been retained. Most of the workmanship from the seawall's initial construction of 1925 and 1928 has been lost due to alterations and replacements. The addition of non-original materials over time has eliminated the original structure's key feature as a board form concrete structure linked to the early development of the Mission Beach area.

NRHP, CRHR, and HRB Criterion C/3/C: The seawall has a diminished integrity of workmanship under Criterion C/3/C. Only in limited sections does the seawall retain the original physical evidence of artisans' skill in constructing near water-tight joints and a wave deterrent. Over time, alterations have removed sections of original workmanship that reflect the seawall's original period of construction 1925 and 1928. Since portions of the seawall were replaced but not the entire structure, this allows for it to display diminished integrity of workmanship and not a complete loss.

## **Feeling**

NRHP, CRHR, and HRB Criterion A/1/A: The seawall retains integrity of feeling under Criterion A/1/A. The seawall retains the ability to present as an integral part of the 1914-1925 Mission Beach Subdivision Plan, continuing to serve its original function as a seawall allowing for pedestrians to travel along the boardwalk and to keep water from the Pacific Ocean off the walkway. The key physical features when taken together allow the seawall to convey its historic character. These key features include the ocean, the beach, the boardwalk, and the buildings along the boardwalk which remain intact allowing the property to present as a utilitarian structure constructed to aid in recreation and tourism.



NRHP, CRHR, and HRB Criterion C/3/C: The seawall does not retain integrity of feeling under Criterion C/3/C. The seawall has undergone several large-scale alterations including an extension in 1968, replacement of original materials during the 1990s and 2000s, a complete replacement of the original 1925 seawall in 2016, and the addition of non-original materials over time that have affected its ability to express its historic character. The seawall does not possess enough key physical elements which would allow it to present as a structure constructed in the mid to late-1920s.

### Association

NRHP, CRHR, and HRB Criterion A/1/A: The seawall retains integrity of association under Criterion A/1/A. The seawall is sufficiently intact to convey its relationship to the early development of Mission Beach (1914-1915). Additionally, it displays the presence of physical features to convey as an integral part of the award-winning Mission Beach Subdivision Plan, which was honored for its innovation in beach resort planning.

NRHP, CRHR, and HRB Criterion C/3/C: The seawall retains integrity of association under Criterion C/3/C. The seawall is sufficiently intact to convey the unique and innovative tongue and groove piling design, which provided a near water-tight joint. Despite alterations to the seawall, it retains the ability to convey its relationship to this innovative design to an observer. The physical features that convey the seawall's historic character have been retained.

### Summary

Under NRHP, CRHR, HRB Criterion A/1/A, the seawall retains integrity of location, setting, design, feeling, and association. The seawall lacks integrity of materials, and workmanship. Consequently, the seawall maintains the requisite integrity to be listed on the NRHP, CRHR, and HRB under Criterion A/1/A. As such, the seawall maintains integrity under HRB Criterion E.

Under NRHP, CRHR, and HRB Criterion C/3/C, the seawall retains integrity of location, design, setting, and association. The seawall has a diminished integrity of workmanship and lacks integrity of materials and feeling. However, the seawall appears to retain sufficient integrity to reflect significance under Criterion C/3/C. As such, the seawall maintains integrity under HRB Criterion E.

The recommended California Historical Resource Status Codes for the Mission Beach Seawall are:

- 2S2: Individual property determined eligible for NR by a consensus through Section 106 process. Listed in the CR.
- 5S2: Individual property that is eligible for local listing or designation.

## 6 Alternatives Impacts Assessment

This section analyzes the impacts of Project activities specific to built environment historical cultural resources. This section includes an analysis of the Mission Beach Seawall (P-37-016522). The analysis includes relevant sections of the Mission Beach Park Improvements Program EIR prepared by Dudek for the City of San Diego in August 2025 (see Chapter 4.6 Historical Resources).

### 6.1 Method for Determining the Significance under CEQA

The State CEQA Guidelines set the standard for determining the significance of impacts to historical resources in Title 14 California Code of Regulations Section 15064.5(b), which states:

A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

Title 14 California Code of Regulations Section 15064.5(b)(1) further clarifies “substantial adverse change” as follows:

Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

Title 14 California Code of Regulations Section 15064.5(b)(2) in turn explains that a historical resource is “materially impaired” when a project:

Demolishes or materially alters in an adverse manner those physical characteristics that convey its significance and that justify its inclusion in or eligibility for inclusion in the California Register, local register, or its identification in a historic resources survey.

A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

As such, the test for determining whether or not a proposed project will have a significant impact on an identified historical resource is whether or not the project will alter in an adverse manner the physical integrity of the historical resource such that it would no longer be eligible for listing in the National or California Registers or other landmark programs.

## 6.2 Assessing Impacts

The CEQA Guidelines provide guidance on minimizing or avoiding significant adverse impacts on historical resources as outlined in the following provisions of Section 15064.5(b)(3)-(5).

- Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource (Section 15064.5[b][3]).
- A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures (Section 15064.5[b][4]).

## 6.3 Impacts Analysis

### **Issue 1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?**

Much of the Improvement Zone has been developed for recreational uses and is highly disturbed. Past dredging and filling activities that created Mission Bay Park has already changed the cultural landscape of the area. The geotechnical report prepared for the Program (Appendix P) identifies that a majority of the Improvement Zone, including the various islands, coves, shorelines, creek, and upland habitat areas, is made of artificial fill consisting of dredged, hydraulically placed material.

The CRCA addresses archaeological and cultural historic resources while the Seawall Memo specifically addresses the Mission Beach Seawall and Bulkhead in detail, which is a built environment historic resource in the Improvement Zone. These studies included research and visual surveys for the purposes of providing historic context and identifying the potential for historic resources to occur.

The CRCA includes a detailed discussion of the records search and pedestrian survey. Portions of the Improvement Zone have been previously surveyed for cultural resources. The South Coastal Information Center records search resulted in the identification of 16 resources within the Improvement Zone. Only four of the identified resources intersect the components identified in the Elements of the Program: CA-SDI-011571, P-37-016522, CA-SDI-000045, CA-SDI-005017. Out of these four resources, only P-37-016522 is a built environment historical resource and is discussed in detail below. The other resources are discussed under other issues or in Section 4.12, Tribal Cultural Resources. Refer to Table 4.6.11 for a complete list of previously recorded resources in the Improvement Zone. Archival review of P-37-016522, which contains a historical ocean front walk, suggests that the resource would be altered by the Program's implementation.

Site surveys were conducted in 2019 and 2024 to identify potential historical resources within the Improvement Zone. The surveys focused on the individual component locations identified within the Seawall Bulkhead, Shoreline Restoration, Upland Habitat Restoration, Water Quality and Wetland

Restoration and Bicycle and Pedestrian Improvements Elements of the Program. The surveys identified that the Element areas have all been extensively developed ranging from pavement covered parking lots, to channeled creeks, to human engineered islands, and no new resources were identified. The findings are discussed further in the applicable Element discussion below.

The Seawall Memo includes a summary of preliminary research and fieldwork findings; a timeline of the resource's development; a delineation of sections per their dates of construction that contribute to the previously established significance; a summary of records search results and previous evaluations; the identification of character-defining features and an integrity analysis of the Mission Beach Seawall (including bulkhead and walkway or boardwalk) and recommendations. The Seawall Memo also clarifies how the seawall has been altered and changed over time. The Seawall Memo has been updated to include the impacts assessment for the Mission Beach Seawall and the appropriate mitigation measures to reduce the identified potentially significant impact to a built environment cultural resource. The findings are discussed further in the applicable Element discussion below.

In general, the Program is found to not be consistent with the Secretary of the Interior's Standards for Rehabilitation (Standards for Rehabilitation) thus the Program would not be in conformance with the City's Historical Resources Regulations. Therefore, the Program would cause a **potentially significant** impact to a historical resource, the Mission Beach Seawall.

#### Wetland and Water Quality Improvements Element

This Element would include the expansion of wetlands and associated habitat through site grading, excavation, and other ground-disturbing activities. There would be both land-based and water-based construction activities. This Element would also include a stockpile location, specifically for the North Fiesta Island Wetland Project. The stockpile locations would not include any excavation activities. None of the components or the stockpile location options within this Element intersect any known built environmental historical resources, and none were identified during the site survey for the components within this Element. As such, the Wetland and Water Quality Improvements Element would not result in a substantial adverse change in the significance of a historical resource, and impacts would be **less than significant**.

#### Restoration of Shoreline Element

This Element would include beach nourishment, stabilization using riprap and berms, and creation of oyster habitat. Excavation and site grading would be required. Most construction activities would be landside, but waterside construction may also be necessary. None of the components within this Element intersect any known built environmental historical resources and no new resources were identified during the site survey. As such, the Restoration of Shoreline Element would not result in a substantial adverse change in the significance of a historical resource, and impacts would be **less than significant**.

#### Upland Habitat and Preserve Expansion Element

This Element would include the establishment and expansion of habitat. Construction activities would include site grading, weed eradication, and the alteration of existing berms. One of the components within this Element includes part of the former Mission Bay Landfill, however, the proposed Program proposes the import of soil to support native vegetation communities and to cap the former landfill. The landfill cap would prevent proposed Program activities from encountering buried landfill materials. None of the other components within this Element intersect any known built environmental historical resources and none were identified during the site survey for

the components within this Element. As such, the Upland Habitat and Preserve Expansion Element would not result in a substantial adverse change in the significance of a historical resource, and impacts would be **less than significant**.

#### Bicycle and Pedestrian Improvements Element

This Element would include bicycle and pedestrian improvements to existing trails and sidewalks, and construction of new trails and sidewalks to connect existing paths within the Improvement Zone. None of the components within this Element intersect any known built environmental historical resources and none were identified during the site survey. As such, the Bicycle and Pedestrian Improvements Element would not result in a substantial adverse change in the significance of a historical resource, and impacts would be less than significant.

#### Restoration of Seawall Bulkhead Element

The Restoration of the Seawall Bulkhead Element includes the replacement of large sections of the seawall, the extension of the seawall, and the replacement of stairways or the addition of ADA ramps for beach access. Minor excavation would be required to remove existing facilities. Only one known built environment historical resource was identified as intersecting with the Restoration of Seawall Bulkhead Element. The Element purposefully includes the alteration of the Mission Beach Seawall (P-37-016522), which was constructed in 1925, 1928, and 1968, making it a structure older than 45 years old.

As discussed in the Seawall Memo, on September 9, 1997, SHPO determined that the seawall is eligible for inclusion in the NRHP, at the level of local significance, under Criteria A and C and did not comment on CRHR and local eligibility. As part of the Seawall Memo Dudek reviewed and synthesized all previous significance arguments for the seawall and recommended that the seawall is eligible for inclusion on the NRHP and CRHR under Criterion A/1 and Criterion C/3 for its association with the early development of Mission Beach (1914-1915), its integral part in the award-winning Mission Beach Subdivision Plan, and its period and method of construction utilizing tongue and groove pilings. Additionally, the seawall retains integrity to be listed on the NRHP/CRHR under Criterion A/1 and Criterion C/3. For all of the reasons described above, the seawall appears eligible for listing as a historical resource by the City of San Diego Historical Resources Board (HRB) for meeting designation Criteria A, C, and E. The eligibility recommendation includes the 2.4-mile-long seawall from Thomas Avenue to the north and the South Mission Beach jetty to the south. Therefore, the Mission Beach Seawall is considered a historical resource for the purposes of CEQA.

The Restoration of the Seawall Bulkhead Element would include the replacement of two segments of the existing seawall (segments A and B). Segment A is approximately 8,760 feet long, sections of which were constructed in 1925, 1928, and 1986. Segment B is approximately 1,020 feet in length and was constructed in 2000 with a parapet height of 36 inches. Improvements to existing beach access points at various locations along segments A and B would also be provided as either replacement stairways or ADA ramps, and one new vehicular access for City use would be created at Thomas Avenue. In addition, a new 375-foot-long segment, segment C would be constructed from the north end of the existing seawall at Thomas Avenue towards Crystal Pier.

Under the Proposed Program, the majority of the Mission Beach Seawall would be replaced with modern construction consistent with required safety and ADA accessibility codes, and would continue to be used for the same purposes prior to Program implementation. The demolition of the seawall in segments A and B and new construction of segment C and ADA ramps would constitute a substantial adverse change in the significance of a

historical resource pursuant to Section 15064.5. The demolition of the resource would result in a loss of all seven aspects of integrity and render the structure unable to convey its significance under NRHP/CRHR Criteria A/1 and C/3 and City of San Diego Criteria A, C, and E. The design for the new seawall would not adhere to the Standards for Rehabilitation because very few original materials, features, finishes, and construction techniques will be preserved or retained, which is required by the Standards for Rehabilitation. Therefore, the Proposed Program would cause a **potentially significant** impact to a historical resource. Implementation of Mitigation Measures (MM) including CUL-1, which requires the documentation of the Mission Beach Seawall and its setting through the preparation of a Historic American Engineering Record (HAER) “Like” documentation, and MM-CUL-2, which requires the development of interpretation and education materials to be displayed to tell the story and history, and explain the historical significance of the original Mission Beach Seawall. The interpretation and education materials may include historic photographs, maps, and architectural renderings of the Mission Beach Seawall. MM-CUL-3 would require the incorporation of historic design features of the Mission Beach Seawall into the new construction. MM-CUL-1, MM-CUL-2, and MM-CUL-3 also required the Program to retain a qualified historian and/or architectural historian to prepare the interpretative materials prior to construction activities and coordinate with City Heritage Preservation staff during the design phase.

The Mission Beach Seawall will be restored to the condition that is required by the City of San Diego’s historical standards consistent with the San Diego Municipal Code. The alteration of the Mission Beach Seawall cannot be determined to be consistent with the Standards for Rehabilitation and will require a deviation from the City’s Historical Resources Regulations. The deviation will require the City to process a Site Development Permit for a Substantial Alteration to a Historical Resource and the Program will be required to make the findings in San Diego Municipal Code Section 126.0505(i). Through the Site Development Permit process, the City will need to prove that the proposed alteration to the Seawall is the minimum deviation from the Historical Resources Regulations required to accommodate the component and that there are no less environmentally damaging alternatives. The design of the component will need to incorporate historic design features of the historically significant Seawall to make the findings and the quality of design will be at a minimum equal to the current structure. These features should include those called out as significant in the 1998 Mission Beach Boardwalk Project EIR/ Environmental Assessment such as the pop-out walls which historically featured open balustrades, elevation of solid walls along the Boardwalk, and specific concrete color and finish.

Therefore, the restoration of the Seawall will also be to a condition no less than the quality of restoration previously performed in 1998 from Thomas Street to Pacific Beach Drive. Implementation of MM-CUL-1, MM-CUL 2, and MM-CUL 3 would reduce impacts to the extent feasible but would not reduce the direct impact to a level of less than significant. As such, the impact would remain **significant and unavoidable**.

## 6.4 Mitigation Framework

**MM-CUL-1 Historic American Engineering Record (HAER) “Like” Documentation.** Prior to Program’s implementation, the City of San Diego shall initiate and sponsor the documentation of the Mission Beach Seawall and its setting through the preparation of HAER “Like” documentation. This documentation shall include digital photographs, a short-form report, and archiving as outlined below, developed in consultation with the City of San Diego. All work shall be conducted by an architectural historian who meets the 2008 Secretary of the Interior’s Professional Qualifications Standards for architectural history and/or history (Qualified Architectural Historian). This mitigation measure is being proposed in compliance with CEQA and does not necessitate approval of this documentation through National Park Service (NPS) or the California Office of Historic Preservation. The HAER “Like” Short Form document shall be limited to the following:



**Digital Photography:** Prior to issuance of any permits or any demolition of the seawall, digital photographic documentation of the Mission Beach Seawall shall be prepared to the National Park Service's 2024 National Register of Historic Places and National Historic Landmarks Program Consolidated and Updated Photograph Policy. The photographer shall be familiar with the recordation of historical resources in accordance with NPS guidelines and digital photography. A minimum of 15 photographs shall be taken, detailing the overall site, select intact portions of the seawall, existing setting, and surrounding viewsheds. Drone photography and/or videography may also be used to capture aerial perspectives of the seawall in addition to digital photography. All photographs shall include a photo index, and field notes, and be identified and labeled using the NPS Consolidated and Updated Photograph Policy 2024.

**Short-Form Report:** In consultation with the City of San Diego, a Qualified Architectural Historian shall prepare a short-form report in conjunction with the large format photographs. The historic report will be formatted to Historic American Engineering Record Guidelines for Historical Reports and include historical background information, original or copies of architectural or engineering drawings, if available, maps, and historic photographs relevant to the Mission Beach Seawall.

**Archiving:** One copy of the final, archival quality documentation shall be provided to the San Diego History Center. Duplicate archival laser-copies (on acid-free paper) of the report and photographs shall be submitted to the City of San Diego. In summary one (1) full set of survey prints, negatives, and report and one duplicate archival copy of surveys are required. The HAER "Like" Short Format documentation for the Mission Beach Seawall must be submitted to repositories within three months of Program's completion.

**MM-CUL-2**

**Development of Public Interpretation and Educational Display.** The City of San Diego shall develop and prepare public interpretation and educational materials to document and explain the importance of the Mission Beach Seawall to the City of San Diego's community and planning history. The display shall be designed in consultation with the project design team, a professional graphic designer, and a qualified historian or architectural historian who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Architectural Historian). Input and review of the content on the display must be completed in conjunction with the City of San Diego's Heritage Preservation staff.

The display shall include the following content:

- A narrative summary of the historical resource's significance, including its association with important events, persons, and/or architectural features.
- Archival photographs and/or drawings of the resource.
- A site map or diagram showing the original location and layout.
- A QR code or link to a digital archive with expanded content, such as oral histories, documents, or additional imagery, if available.

Historical ephemeral materials and excerpts from historic contexts from technical reports prepared as part of the proposed Program and maps shall be included. The display should express the

Mission Beach Seawall's association with the early development of Mission Beach and its innovative tongue and groove pilings design.

The interpretive and educational display shall be incorporated into the design of the proposed Program for public accessibility at the new seawall site. Specifics for establishing the appropriate medium to display this information shall be done in consultation with the Project proponent. The following performance standards for the display are required:

- The display shall be constructed of durable, weather-resistant materials and be designed to be accessible in accordance with ADA standards.
- The content shall be reviewed and approved by the City of San Diego prior to installation.
- The display shall be installed within three months of Project completion and maintained in good condition for a minimum of 20 years.

**MM-CUL-3**

**Incorporation of Historic Design Features into New Construction.** During the design phase of the Program's Restoration of the Seawall Bulkhead element, City of San Diego Heritage Preservation staff will review all construction drawings to ensure the incorporation of the historic design features identified in the 1998 Mission Beach Boardwalk Project EIR/ Environmental Assessment such as the pop-out walls which historically featured open balustrades, elevation of solid walls along the Boardwalk, and specific concrete color and finish. The Mission Beach Seawall will be restored to the condition that is required by the City' of San Diego's historical standards consistent with the San Diego Municipal Code. This mitigation is to ensure that the quality of design will be at a minimum equal to the current structure.

The Mission Beach Seawall will be restored to the condition that is required by the City' of San Diego's historical standards consistent with the San Diego Municipal Code. The alteration of the Mission Beach Seawall cannot be determined to be consistent with the Standards for Rehabilitation and will require a deviation from the City's Historical Resources Regulations. The deviation will require the City to process a Site Development Permit for a Substantial Alteration to a Historical Resource and the Program will be required to make the findings in San Diego Municipal Code Section 126.0505(i). Through the Site Development Permit process, the City will need to prove that the proposed alteration to the Seawall is the minimum deviation from the Historical Resources Regulations required to accommodate the component and that there are no less environmentally damaging alternatives. The design of the component will need to incorporate historic design features of the historically significant Seawall to make the findings and the quality of design will be at a minimum equal to the current structure. These features should include those called out as significant in the 1998 Mission Beach Boardwalk Project EIR/ Environmental Assessment such as the pop-out walls which historically featured open balustrades, elevation of solid walls along the Boardwalk, and specific concrete color and finish.

The following mitigation measure MM-CUL-4 would address the potential impacts of the Program related to inadvertent discovery of archaeological resources or human remains during excavation associated with the construction and maintenance of the Rose Creek Bicycle and Pedestrian Improvements Element and the Seawall Bulkhead Restoration Element. The following mitigation measure MM-CUL-5 would ensure proper cultural resource review of future proposed projects that



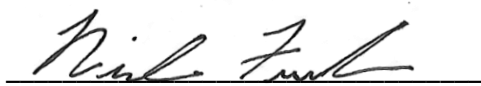
will be processed under this EIR but were not reviewed in the Cultural Resources Constraints Analysis for the Mission Bay Park Improvements Program (Appendix N).

## 6.5 Level of Significance After Mitigation

As analyzed above, Program implementation in compliance with the laws described above, and implementation of the City's cultural mitigation measures **MM-CUL-1 and/or MM-CUL 2 and MM-CUL 3** is required due to the significant impacts to the Mission Beach Seawall although mitigation is required the impact would remain **significant and unavoidable**.

Thank you for your consideration of this memorandum. We are happy to answer any questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole Frank", is written over a horizontal line.

Nicole Frank, MSHP Architectural Historian

## 7 Works Cited

- Donaldson, Milford Wayne. *Final Finding of Effect for the Mission Beach Boardwalk Expansion*. SD-04800. August 7, 1998.
- Harris & Associates. *Mission Beach Seawall and Boardwalk Integrity Study, Mission Beach Boardwalk, San Diego, CA*. April 20, 2021.
- Widell, Cherilyn. "Office of Historic Preservation, Department of Parks and Recreation, Letter FHWA970721A," P-37-016522. September 9, 1997.

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# **Attachment A**

## Preparer's Qualifications

# Nicole Frank, MSHP

## ARCHITECTURAL HISTORIAN

Nicole Frank (*nih-COHL FRAYNK*; *she/her*) is an architectural historian with 8 years' experience in the historic preservation field. Nicole's professional experience encompasses various projects for local agencies, private developers, and homeowners in both highly urbanized and rural areas. Projects have included reconnaissance-level surveys, preparation of resource-appropriate and citywide historic contexts, and historical significance evaluations in consideration of the National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR), and local designation criteria. Nicole has experience conducting historic research, writing landmark designations, performing conditions assessments, and working hands-on in building restoration projects throughout the United States. Nicole also has governmental experience with the City of San Francisco's Planning Department and the City of Chicago's Landmark Designations Department. She meets the Secretary of the Interior's Professional Qualification Standards for Architectural History.

## Project Experience

### Development

**Altrudy II Senior Apartments Project, Orange County Housing and Community Development, Yorba Linda, California.** Orange County Housing and Community Development retained Dudek to prepare a Cultural Resources Inventory and Evaluation Report for the proposed Altrudy II Senior Apartments Project. The project is in Yorba Linda, Orange County, California, on Assessor Parcel Numbers (APNs) 323-231-18 and 323-231-19. The project involves demolishing the existing residences on the two parcels for the construction and operation of a 71-unit senior affordable housing community. The buildings on the development site are not currently listed under any national, state, or local landmark program. Dudek concluded that neither of the subject properties are eligible for listing in the NRHP or CRHR due to a lack of significant associations and architectural merit. The recommended California Historical Resource Status Code for these properties is 6Z, meaning they were found ineligible for the NRHP and CRHR through survey evaluation. Acting as architectural historian, assisted in research and site visit coordination and reviewed the report for accuracy. (2024–2025)

**Valley Center Indian Creek Project, Indian Creek Associates LLC, San Diego County, California.** Dudek was retained by Indian Creek Associates LLC to complete a Historic Technical Report for the Valley Center Indian Creek Project located in the Valley Center Community Plan Area (CPA), San Diego County, California. The project would involve developing approximately 575 residential units, 8.73 acres of retail uses, and 11.33 acres of parks and open space, to be located along Rough Creek. The purpose of the report was to identify all built environment properties that may be considered historical resources, as defined by the California Environmental Quality Act (CEQA) and County of San Diego Guidelines, where project construction or operation may result in impacts under CEQA. The



### Education

School of the Art  
Institute of Chicago  
MS, Historic Preservation,  
2018

College of Charleston  
BA, Historic Preservation  
and Art History, 2016

### Professional Affiliations

Encinitas Preservation  
Association, Past  
President

California Preservation  
Foundation

Association for  
Preservation Technology  
(APT)

report identified four built environment properties as a result of an intensive-level survey. After thorough consideration of historical significance criteria, all properties addressed in the report do not appear eligible for national, state, or local listing, either individually or as part of a multi-property district. Therefore, there are no built environment historic-era properties located in the Area of Potential Impacts (API) that qualify as historical resources for the purposes of CEQA. Acting as architectural historian, assisted in research and site visit coordination, provided supplemental research, and reviewed the report for accuracy. (2024–Present)

**Mission Avenue Apartments Project, H.G. Fenton Company, Oceanside, California.** Dudek was retained by H.G. Fenton Company to prepare a Built Environment Inventory and Evaluation Report for the proposed Mission Avenue Apartments in Oceanside, California. The project involves redeveloping a 1.5-acre site at 801 and 815 Mission Avenue in Oceanside. Dudek's archival research and field survey found two historic-age resources within the API. The two properties, 801 Mission Avenue and 815 Mission Avenue, have not been previously recorded and therefore required recordation and evaluation as part of this study. The report concluded that both properties within the API are ineligible for inclusion in the NRHP, CRHR, and as a City of Oceanside historic site. As such, both properties buildings are not considered historical resources for the purposes of CEQA. Acting as architectural historian, assisted in research and site visit coordination, provided supplemental research, and reviewed the report for accuracy. (2024–Present)

**Mesa Verde Specific Plan, Mesa Verde Owner LLC, Calimesa, California.** Dudek was retained by Mesa Verde Owners LLC to complete a built environment inventory and evaluation report for the proposed Mesa Verde Specific Plan 2023 Project, which is an Amendment to the Mesa Verde Estates Specific Plan (SPA 13-01) that was previously adopted in 2007 and subsequently amended in 2017. Complete evaluations for the six properties located within the area of potential effects (APE) were detailed in the report. All properties addressed do not appear eligible for national, state, or local listing either individually or as part of a multi-property district. Acting as architectural historian, conducted a survey of the project site and assisted in the preparation of the report and the associated property significance evaluations. (2023–Present)

**Historical Resource Research Report for 1424 Olivet Lane, L Jane Ryan Trust, La Jolla, California.** Dudek was retained by L Jane Ryan Trust to prepare a historical resource research report for the single-family residence located at 1424 Olivet Lane, La Jolla, California. The report was prepared in accordance with City of San Diego guidelines and evaluated under all applicable city guidelines and regulations. The property was nominated for designation as a historical resource under Historical Resources Board Criteria A, B, and C under the name the Harry W. Child House. Acting as project manager and primary author, conducted the intensive-level survey, building development and archival research, development of an appropriate historic context for the property, and recordation and evaluation under city guidelines and regulations. (2022–2023)

**Vista Melrose Residential Project, Urban Advisory & Building Group LLC, Vista, California.** Dudek was retained by Urban Advisory & Building Group LLC to complete a historical resources technical report (HRTR) to identify all historical resources (if any) on the project site to determine whether the proposed project would result in a significant impact to historical resources under CEQA. The report included the results of a California Historical Resources Information System records search; an intensive survey of the project site by a qualified architectural historian; building development and archival research; development of an appropriate historic context for the evaluation of the project site; and recordation and evaluation of one church property and one single-family residential property over 45 years old for historical significance and integrity in consideration of NRHP, CRHR, and City of Vista designation criteria and integrity requirements. Acting as architectural historian, conducted a survey of the project site and prepared the report and the associated property significance evaluations. (2022–2024)

**Vista Foothill Residential Project, TTLC Vista Foothill LLC, Vista, California.** Dudek was retained by TTLC Vista Foothill LLC to complete an HRTR to identify all historical resources (if any) on the project site to determine whether the proposed project would result in a significant impact to historical resources under CEQA. One of the five parcels that comprised the project site contained buildings over 45 years old and required evaluation as a potential historical resource. As a result of Dudek's extensive archival research, field survey, record search, and property significance evaluations, no historical resources were identified within the project site, nor were any adjacent cultural resources identified that could be indirectly impacted by proposed project activities. Acting as built environment project manager, conducted intensive-level survey, delegated writing and research tasks, and coauthored the technical report. (2022–2024)

**Tooley Carlsbad Project, Atlantis Group Land Use Consultants, Carlsbad, California.** Dudek was retained by Atlantis Group Land Use Consultants to prepare an HRTR for the Tooley Carlsbad Project, which involved constructing a mixed-use development consisting of 219 multifamily units and 13,764 square feet of retail space, including parking and open space in Carlsbad, California. The report included an intensive-level survey of the project site and its vicinity by a qualified architectural historian; building development and archival research; development of an appropriate historic context for the project site; and recordation and evaluation of one built environment resource with buildings over 45 years old for historical significance and integrity in consideration of NRHP, CRHR, and local designation criteria and integrity requirements. After research and evaluation, the project site did not appear eligible under any NRHP, CRHR, or City of Carlsbad cultural resource designation criteria due to a lack of significant historical associations and architectural merit. Acting as built environment project manager, conducted intensive-level survey, delegated writing and research tasks, and coauthored the technical report. (2022–2023)

**6365 Imperial Avenue Historical Resources Technical Report Project, Denya LLC, San Diego, California.** Dudek was retained by Denya LLC to prepare an HRTR for a property located at 6365 Imperial Avenue in the City of San Diego. The report was prepared in accordance with CEQA Guidelines, Section 15064.5, for historical resources and all applicable City guidelines and regulations. One built environment resource was identified with the subject property as a result of the background research and survey: the commercial building associated with the address 6365 Imperial Avenue. The significance evaluation found that 6365 Imperial Avenue was not eligible under any designation criteria due to a lack of the requisite integrity necessary to convey significant historical associations and a lack of architectural merit. Acting as architectural historian, coauthored the technical report and conducted a pedestrian survey of the site. (2022)

**5146–5148 and 5150 Dehesa Road Project, Kevin R. Carlin, San Diego County, California.** The property owner, Kevin R. Carlin, proposed a Tentative Parcel Map to subdivide an existing 5.87-acre parcel into four parcels and one remaining undeveloped parcel, known as the 5146–5148 and 5150 Dehesa Road Project. Dudek completed an HRTR to identify all historical resources (if any) within the project area to determine whether the proposed project would result in a significant impact to historical resources under CEQA. To complete the evaluation of significance, Dudek conducted archival and building development research and developed an appropriate historic context for the evaluation of the project area. All buildings and structures over 45 years old were recorded and evaluated for historical significance. The subject property was recommended not eligible for inclusion in the NRHP, CRHR, and San Diego County Local Register of Historical Resources under all designation criteria due to a lack of historical or architectural significance and lack of integrity. Acting as architectural historian, coauthored the technical report and conducted a pedestrian survey of the site. (2021–2022)

**Downtown Buena Park Project, Merlone Geier, Buena Park, California.** Dudek prepared an HRTR for a project that involved redeveloping a former Sears building, parking lot, and Sears Automobile Service Station at the Buena Park Downtown Mall, located at 8150 La Palma Avenue in the City of Buena Park. The redevelopment plans included 1,381 residential units, 41,500 square feet of amenity and lobby space, and 2,551 residential parking

spaces over 28-acres. The report included an intensive-level survey of the Buena Park Downtown Mall by a qualified architectural historian for historical significance and integrity in consideration of NRHP and CRHR designation criteria; building development and archival research; development of an appropriate historic context for the Buena Park Downtown Mall; and recordation and evaluation of the Sears building, a built environment resource over 45 years old. The Buena Park Downtown Mall did not appear eligible under any NRHP or CRHR designation criteria due to a lack of significant historical associations, architectural merit, and compromised integrity. Acting as architectural historian, coauthored the technical report and conducted a pedestrian survey of the site. (2021)

**6th and Victoria Avenue Warehouse Project, Confidential Client, Highland, California.** Dudek completed a Historic Resource Evaluation Report (HRER) for a project that involved constructing a single 307,455-square-foot industrial/warehouse building (inclusive of 10,000 square feet of office/mezzanine). Associated improvements included loading docks, truck and vehicle parking, and landscape areas. The report included an evaluation of three buildings over 45 years old. Each property was recorded on State of California Department of Parks and Recreation Series 523 Forms (DPR Forms) and was evaluated in consideration of NRHP and CRHR designation criteria and integrity requirements. As architectural historian, authored a historical resources inventory and evaluation report. (2021)

**Forest Resiliency Program Project SPI Keystone, Golden State Finance Authority, Tuolumne County, California.** Dudek completed a historical resources inventory and evaluation report for a project that involved redeveloping a site in La Grange and Jamestown in Tuolumne County to facilitate transporting forest material (e.g., trees with no lumber value and underbrush) by truck, turning it into wood fuel pellets, and then shipping the pellets from the site using the existing railroad line. The report was prepared in accordance with Section 106 of the National Historic Preservation Act (NHPA) (36 Code of Federal Regulations 800), CEQA Section 15064.5, Public Resources Code 5024, and applicable local regulations. This report included (1) a California Historical Resources Information System records search conducted at the Central California Information Center for the APE plus a 1-mile buffer; (2) a pedestrian surface reconnaissance of the APE for archaeological and built environment resources; and (3) a historical significance evaluation of Property 1 APNs (063-190-056, 063-350-004, 063-350-005, and 063-190-051) and Property 2 (Sierra Railroad–Mainline, Keystone Segment) located within the APE. As architectural historian, authored a historical resources inventory and evaluation report. (2021)

**Senior Residences at Hillcrest Project, DFA Development, San Diego, California.** Dudek prepared a Historic Properties Inventory Report for the project, which involved developing a 68-unit, affordable senior housing community located in the Hillcrest neighborhood of San Diego. The project site was partially developed with existing buildings for preschool services associated with the adjacent University Christian Church and a parking lot. The project would receive U.S. Department of Housing and Urban Development project vouchers issued to the San Diego Housing Commission and was therefore required to undergo a National Environmental Policy Act (NEPA) analysis for receiving federal funding. Acting as architectural historian, coauthored the technical report and conducted a pedestrian survey of the site. (2020–2021)

**Sycuan Fee to Trust Project, Sycuan Band of the Kumeyaay Nation Reservation, Unincorporated San Diego County, California.** Dudek completed a Historic Properties Inventory and Evaluation Report for the proposed project, located within the vicinity of El Cajon, California, in unincorporated San Diego County. The project involved a fee-to-trust transfer of five parcels that cumulatively totaled approximately 40 acres. The transfer of land from the Sycuan Band to the Bureau of Indian Affairs (the federal lead agency) included several parcels. Dudek's report included developing a project APE map; the relevant results of a California Historical Resources Information System records search and background research; a pedestrian survey of the APE for built environment resources; and a historical significance evaluation of all properties over 50 years old within the APE, in consideration of



potential adverse effects to historic properties under Section 106 of the NHPA. The evaluation found that Properties 1, 2, 4, and 5 were not eligible for the NRHP at the individual level or as part of a larger historic district. As a result, no historic properties were identified within the APE, and Dudek recommended a finding of No Historic Properties Affected. As architectural historian, conducted background research and a pedestrian survey. (2021)

**Ranch at River Bend Project, Save Gregory Canyon Hills LLC, Community of Pala, California.** Dudek completed an HRTR supporting the proposed project, which included the development of a new, mixed-use community. Acting as architectural historian, coauthored the technical report and conducted a pedestrian survey of the site. (2020)

**Enclave at Ivanhoe Ranch Project, Vance and Associates, Rancho San Diego, California.** Dudek completed an HRTR supporting the proposed residential development project. The project site totaled approximately 121.9 acres in Rancho San Diego. Included in the project site was a historic-era complex of horse ranch buildings and accompanying residences, located at 3256, 3261, 3263, 3267, and 3269 Ivanhoe Ranch Road (APNs 518-030-41, 518-030-43, 518-030-44, and 518-030-45), which were evaluated for historical significance. This study was conducted in accordance with Section 15064.5(a)(2)-(3) of CEQA guidelines, and the project site was evaluated in consideration of NRHP, CRHR, and County of San Diego Historic Preservation Ordinance and resource protection ordinance requirements. Acting as architectural historian, coauthored the technical report and conducted a pedestrian survey of the site. (2020)

**Shawnee/CG7600 Master Plan Redevelopment Project, Palmer Mission Gorge Properties LP, San Diego, California.** Dudek conducted a Potential Historical Resource Review (in accordance with Information Bulletin 580) for four properties over 45 years old within the City of San Diego. Acting as architectural historian, conducted a photographic survey of the four properties within the project site. Updated three 2011 DPR Forms and created a new DPR Form for a previously unrecorded property within the project site. (2020)

**740–790 East Green Street Mixed-Use Project, Pasadena, California.** Dudek completed a Cultural Resources Technical Report (CRTR) for five commercial buildings located in the City of Pasadena (Assessor's Identification Nos. 5734-025-014, 024, 026, 029, 027). The study included a pedestrian survey of the proposed project area, building development and archival research, development of an appropriate historic context for the property, and recordation and evaluation of the property for historical significance and integrity in consideration of NRHP, CRHR, and local eligibility requirements. Acting as architectural historian, updated the Pasadena historic context, conducted archival research, and wrote significance evaluations for the five buildings that are over 45 years old. (2019)

**8850 Sunset Boulevard Project, City of West Hollywood, California.** Dudek completed a CRTR for the proposed project, which involved demolishing existing buildings and constructing and operating a new mixed-use hotel and residential building on a property along the south side of Sunset Boulevard, extending the full city block between Larrabee Street and San Vicente Boulevard. Acting as architectural historian, assisted in the completion of the technical report as the primary writer. (2019)

**Palmetto Avenue Warehouse Project, Patriot Development Partners, Rialto, California.** Dudek conducted a Cultural Resources Report in support of the proposed project, which involved demolishing buildings on six parcels in the City of Rialto and constructing an industrial/warehouse building on an approximately 4.24-acre property located at the northeast corner of Palmetto Avenue and Baseline Road. Acted as evaluator for three of the six properties, which were at least 45 years old. (2019)



**14545 Lanark Street Project, Clifford Beers Housing Inc., Los Angeles, California.** Dudek completed an HRER for a property located at 14545 Lanark Street in the Panorama City neighborhood of Los Angeles (APN 2210-011-900). Acting as architectural historian, authored the HRER for the subject property, a Public Social Services Department building constructed in 1967. (2019)

**Confidential Solar Energy Project, Confidential Client, California.** Dudek completed an HRTR for a confidential solar project. Acting as architectural historian, authored the report evaluating a complex of 20 buildings for historical significance. (2019)

**1605 Industrial Avenue Warehouse Project, City of San José, California.** Acting as architectural historian, coauthored the CRTR for the project, which included the construction of an approximately 186,000-square-foot industrial warehouse building on an approximately 10.96-gross-acre property located in the northern part of the City of San José. Preparation of the historical context statement involved archival research, building descriptions, historic context development, and historical significance evaluations. (2018)

**Jefferson La Mesa Project, JPI, La Mesa, California.** The project proposed to demolish three industrial automotive buildings to redevelop the property. Served as architectural historian and coauthor of the project HRER. Contributed archival research and historical context development for the three automotive buildings. (2018)

## Education

**Life Sciences Building Historical Resources Evaluation Report, San Diego State University, California.** Dudek was retained by San Diego State University to complete a historical resources evaluation report for the Life Sciences Building Project, which involves demolishing of a substation and constructing a new six-story building. The purpose of the report is to determine if the project would impact any historical resources pursuant to CEQA. As an architectural historian, coauthored and completed a review of the report. (2024–Present)

**Evolve Student Housing Project, San Diego State University, San Diego, California.** The project is for construction of new student housing, dining, and auxiliary uses to the university's main campus and requires the demolition of 13 apartment buildings that are more than 45 years of age. The project is subject to CEQA and California PRC 5024 and 5024.5 and the buildings required inventory and evaluation to determine if they were historical resources and if they should be placed on the State's Master List. Part of a team of architectural historian, reviewed the report and conducted supplemental research. (2024–2025)

**Riverside City College Life Science/Physical Science Reconstruction Project, Riverside Community College District, California.** Dudek completed a CRTR for the project that involved modernizing the currently vacant Life Science and Physical Science connected buildings on the Riverside City College campus to allow for growth in the Business and Information Systems programs. Acting as architectural historian, conducted research on the buildings associated with the project. (2021)

**Richland Elementary School Reconstruction Project, San Marcos United School District, California.** Dudek completed a CRTR for the project located at 910 Borden Road. The proposed project involved demolishing the existing Richland Elementary School, which included 7 permanent buildings and 24 portable classrooms, and the reconstruction of the school, including the redevelopment of play fields and playgrounds. Acting as architectural historian, conducted a field visit, researched the school district and elementary school, and coauthored the technical report. (2021)

**University of California San Diego, Future College Living and Learning Neighborhood; University of California San Diego Campus Planning Office; California.** Dudek was retained by the University of California (UC) San Diego

Campus Planning Office to conduct a visual analysis for the proposed project, which consisted of five housing buildings providing an additional 2,000 beds to serve the student population of the UC San Diego campus. As architectural historian, conducted a field visit to gain a better understanding of the visual environment of the project site and surrounding area. (2020)

**San Francisco State University Master Plan Update Environmental Impact Report; San Francisco State University Capital Planning, Design, and Construction; California.** Dudek conducted a historic built environment study for the proposed project. Only buildings over 45 years old and proposed for renovation or demolition were included in this historic built environment study. Acting as architectural historian, participated in a survey of the San Francisco State University (SFSU) Psychology and Ethnic Studies Building and conducted archival research to prepare appropriate historic context for San Francisco, SFSU, and the Psychology and Ethnic Studies Building. Conducted research on 18 buildings located on the SFSU campus and wrote historic contexts, descriptions, and lists of alterations for each. (2019)

**Keats Building and Amphitheater; California State University, Fresno; California.** Acting as architectural historian, authored the description of the amphitheater and Keats Building on the California State University (CSU) Fresno campus for the CRTR. Also prepared DPR Forms for the two buildings. (2018)

**College Park Demolition Project, CSU Chico, California.** Dudek was retained by CSU Chico to complete a cultural resources study for a project that involved demolishing 10 single-family residences near the CSU Chico campus. As architectural historian, coauthored a cultural resources report for CSU Chico, writing 10 building feature descriptions. (2018)

## Energy

**Dirac BESS Project, Ayapa Power, Chino, California.** The project would involve constructing, operating, and eventually repowering or decommissioning a 315-megawatt (MW) battery energy storage system (BESS) located on approximately 13.89 acres in Chino. Serves as architectural historian completed archival research, and coauthored the report. (2025–Ongoing)

**Solar Project, Confidential Client, Marion County, South Carolina.** Dudek was retained by a confidential client to complete a Built Environment Historic Resources Survey, which included the results and recommendations from conducting cultural resource intensive and evaluation surveys. The Project consists of discontinuous, privately owned parcels totaling approximately 750 leased acres being considered for solar development. These efforts for built environment include the development of a study area or API, an intensive-level survey of the API for built resources of historic age (45 years of age or older), available building development and archival research, the creation of an appropriate historic context, and recordation and evaluation of historic-era properties located in the API under NRHP designation criteria. Acting as architectural historian, Frank completed the intensive-level survey, completed archival research, and coauthored the report. (2023–Present)

**Architectural Inventory and Evaluation Report, Confidential Client, Lyon County, Nevada.** Dudek was retained by a confidential client to complete an architectural inventory and evaluation report for an energy-related development project, which involved demolishing several historic-era buildings and structures. The purpose of the report is to determine if the project would impact any historical resources pursuant to NEPA. Acting as architectural historian, coauthored the report, surveyed the properties, wrote significance evaluations and building descriptions, and completed archival research. (2023–Present)

**Seguro Storage Project, Seguro Storage LLC, San Diego County, California.** Dudek was retained by Seguro Storage LLC to complete a historic technical report for the Seguro Storage System Project. The project involves constructing a 400-megawatt battery energy storage system (BESS) in phases or all at once, depending on when full capacity is needed. The project would interconnect to the nearby San Diego Gas & Electric Escondido Substation via newly installed overhead generation-tie (gen-tie) line. Dudek identified 13 properties located within the APE that required evaluation. After thorough consideration of historical significance criteria, all properties addressed in the report do not appear eligible for national, state, or local listing either individually or as part of a multi-property district. Acting as architectural historian, conducted pedestrian survey and coauthored the historic technical report. (2023–Present)

**Battery Energy Storage Project, Confidential Client, San Diego, California.** Dudek prepared an HRER for a project that involved developing a BESS located in San Diego. All buildings and structures over 45 years old identified within the project area were recorded and evaluated for historical significance. The significance evaluation involved conducting archival research and building development research for the project area and completing an appropriate historic context. Acting as architectural historian, conducted pedestrian surveys to evaluate the presence of historic built environmental resources and authored the HRER. (2021)

**Battery Energy Storage Project, Confidential Client, Grand Terrace, California.** Dudek prepared an HRER for a project that involved developing a BESS in the City of Grand Terrace. This report included development of a built environment study area map, a pedestrian survey of the proposed project study area for built environment resources, and a historical significance evaluation of a steam plant in consideration of state designation criteria and integrity requirements. The significance evaluation found that the steam plant is not eligible under any designation criteria due to a lack of architectural merit and a lack of the requisite integrity necessary to convey significant historical associations. As such, the steam plant was not considered a historical resource under CEQA. Acting as architectural historian, conducted pedestrian surveys and authored the HRER. (2021)

**Solar Project, Confidential Client, San Diego County, California.** Serving as architectural historian, coauthored the HRTR for the project, which involved developing a solar energy facility and energy storage system. The project site totals approximately 1,356 acres and was in unincorporated southeastern San Diego County. The HRTR involved a pedestrian survey for the presence of historic built environment resources. All buildings and structures over 45 years old were recorded and evaluated for historical significance. The significance evaluation included conducting archival research and building development research for a dairy and creamery complex located on the project site and completing a historic context. The complex of dairy buildings was evaluated for historical significance and was not eligible for inclusion in the NRHP, CRHR, or the County Register due to a lack of significant historical associations. (2020)

## Healthcare

**St. Joseph’s Hospital Master Plan Project, Devenney Group Ltd., Stockton, California.** Dudek prepared a historical resources inventory and evaluation report in support of the project. The proposed project site included five properties in the City of Stockton: (1) 1638 North California Street (APN 127-190-32), (2) 1800 North California Street and 542 McCloud Avenue (APN 127-180-44), (3) 534 East Maple Street (APN 127-190-30), (4) 425 East Harding Way (APN 127-150-39), and (5) 445 East Harding Way (APN 127-150-51). Served as architectural historian and coauthor of the historical resources inventory and evaluation report, conducting research on properties 2 to 4 of the historic-age built environmental resource properties, primarily located within the St. Joseph’s Medical Center Complex or on parcels adjacent to the complex that may be acquired. (2020)

## Historical Resource Treatment Plans, Impacts Analysis (Secretary of the Interior's Standards Compliance Review)

**Historical Resource Assessment Report NoHo Garden Apartment Project, Volunteers of America of Los Angeles, Los Angeles, California.** The Volunteers of America of Los Angeles proposed to construct additional affordable units at the North Hollywood Manor. North Hollywood Manor, as part of SurveyLA, was determined eligible for listing on the NRHP, the CRHR, and as a City of Los Angeles Historic-Cultural Monument under Criterion C and 3 for its architectural significance (associated status codes 3S;3CS;5S3). Assisted the Volunteers of America of Los Angeles in conforming to the Secretary's Standards and therefore complying with CEQA, assessing any potential impacts the project may have on the identified historical resource, and recommending mitigation measures, as appropriate. (2023)

### Municipal

**As-Needed Historic Research Consulting Services, City of Coronado, California.** Dudek provides as-needed historic consulting services for various projects in the City of Coronado. Each evaluation involves the creation of an occupancy timeline, supplemental research on occupants, building development research (including architects, builders, and property), a pedestrian survey of the project area, creation of a description of the surveyed resource, completion of a historical significance evaluation report in consideration of designation criteria and integrity requirements, and Historic Resource Commission attendance. Acting as project manager and architectural historian, authored or coauthored over 50 HRERs. Project manager role includes serving as the primary contact for the City of Coronado, site and research visit coordination, review of all reports for consistency and accuracy, supplemental research, and Historic Resource Commission attendance. (2019–Present)

**Los Angeles County South Bay Area Plan Project, County of Los Angeles Department of Regional Planning, California.** Dudek was retained by the County of Los Angeles Department of Regional Planning to prepare a historic context statement in support of the project. The goal of the historic context statement is to inform, enhance, and streamline the larger project as it pertains to historical resources. The communities included within the historic context statement include the following: Alondra Park/El Camino Village, Del Aire/Wiseburn, Hawthorne Island, La Rambla, Lennox, West Carson, and Westfield/Academy Hills. The historic context statement documents the development history of the communities from the rancho period to the present; identifies important themes, events, and patterns of development; and describes the different property types, styles, builders, and architects associated with these important periods and themes. The document would also provide registration requirements and recommendations for future study/action by the County of Los Angeles to facilitate and streamline the historic preservation program. Responsibilities include co-project management, conducting archival research, coauthoring the historic context statement, engaging with interested parties, collaborating with the geographic information system (GIS) team to create an online mapping tool, performing field survey, attending public meetings, and collaborating with the graphics team for flyers and social media content. (2023–2024)

**Ben Clark Training Center Modernization Project; Riverside County Fire, California Department of Forestry and Fire Protection; California.** Dudek was retained by Riverside County Fire and the California Department of Forestry and Fire Protection to conduct a built environment inventory and evaluation study for the Ben Clark Training Center Modernization Project. Only buildings and structures over 45 years old were included in the historic built environment study of the training center campus. The report identified 12 buildings requiring evaluation, which were divided into four building typologies (Assembly Buildings, Storage and Maintenance Buildings, Living Quarters, and Education and Training Buildings) and evaluated as groups within those typologies. The report concluded that all 12 buildings within the study area were ineligible for inclusion in the NRHP, CRHR, and the City

of Riverside's list of historically designated resources. Acting as architectural historian, conducted pedestrian survey and coauthored the built environment inventory and evaluation report. (2023–2024)

**Ocean Beach Pier Improvements Project, City of San Diego, California.** Dudek was retained by the City of San Diego to prepare an HRTR for the Ocean Beach Pier Improvements Project. The City requested an evaluation of whether the Ocean Beach Pier (Ocean Beach Municipal, Pier, or Pier Project site) met eligibility criteria for local, state, or federal designation. The report was prepared in accordance with CEQA Guidelines, Section 15064.5, for historical resources and all applicable City guidelines and regulations. As a result of the evaluation, the Ocean Beach Pier was recommended eligible under NRHP and CRHR Criteria A/1 and C/3 and San Diego Historical Resources Board Designation Criteria A, C, and D. The Ocean Beach Pier reflected special elements of Ocean Beach's historical and economic development and embodied distinctive characteristics of the concrete fishing pier typology. Responsibilities included fieldwork, archival research, and the associated property significance evaluation. (2022)

**Los Angeles County Metro Area Plan Project, County of Los Angeles Department of Regional Planning, California.** Dudek was retained by the County of Los Angeles Department of Regional Planning to prepare a Historic Context Statement in support of the project. The goal of the Historic Context Statement component was to inform, enhance, and streamline the larger project as it pertained to historical resources. The communities involved within the Historic Context Statement included East Los Angeles, East Rancho Dominguez, Florence-Firestone, Walnut Park, West Athens-Westmont, West Rancho Dominguez-Victoria, and Willowbrook. The Historic Context Statement documents the development history of the communities from the rancho period to the present; identifies important themes, events, and patterns of development; and describes the different property types, styles, builders, and architects associated with these important periods and themes. The document also provided registration requirements and recommendations for future study/action by the County of Los Angeles to facilitate and streamline the historic preservation program. Responsibilities included conducting archival research, coauthoring the Historic Context Statement, engaging with interested parties, collaborating with the GIS team to create an online mapping tool, performing field survey, attending public meetings, and collaborating with the graphics team for flyers and social media content. (2021–2022)

**Florence-Firestone CPA Historic Resources Survey; County of Los Angeles Department of Regional Planning; California.** Dudek was retained by the County of Los Angeles Department of Regional Planning to prepare a Historic Context Statement and conduct a Historic Resources Survey for the Florence-Firestone CPA. The goal of the project was to document the development history of the community from the rancho period to the present; identify important themes, events, and patterns of development; and describe the different property types, styles, builders, and architects associated with these important periods and themes. The document also provided registration requirements and recommendations for future study/action by the County of Los Angeles to facilitate and streamline the historic preservation program. Responsibilities included conducting archival research, coauthoring the Historic Context Statement, engaging with interested parties, collaborating with the GIS team to create an online mapping tool, attending public meetings, and collaborating with the graphics team for flyers and social media content. (2021–2022)

**East Los Angeles Historic Resources Survey of Historic Age Commercial Signage; County of Los Angeles Department of Regional Planning; California.** Dudek was retained by the County of Los Angeles Department of Regional Planning to perform a Historic Resources Survey and focused Historic Context Statement for historic age commercial signage located in the East Los Angeles CPA. The goal of the project is to document the history of commercial signage, record and evaluate significant historic signs, and designate all applicable signs as County Landmarks. Responsibilities include archival research, collaboration with the GIS team to create an online mapping tool, and collaboration with the graphics team for flyers and social media content. (2021)



**Mission Bay Park Improvements Project, City of San Diego, California.** Dudek reviewed the City's proposed seawall and bulkhead designs for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, specifically the Standards for Rehabilitation. This review included advising the design team on how to remain in conformance with the standards by way of informal design review/check-ins throughout the design review process. Acting as architectural historian, conducted a pedestrian survey, and coauthored the Mission Beach Seawall Evaluation Memorandum. (2021–2022)

**Pier View Way Bridge and Lifeguard Headquarters and Beachfront Phase II Project, Confidential Client, Oceanside, California.** Dudek prepared a Built Environment Inventory and Evaluation Report for the proposed Pier View Way Bridge and Lifeguard Headquarters and Beachfront Phase II Project. The Project is in the City of Oceanside (City) and includes five properties, the Junior Seau Beach Community Center (Map ID 1), Pier View Way Bridge and Lifeguard Headquarters (Map ID 2), the Junior Seau Amphitheater/Bandshell (Map ID 3), Oceanside Comfort Station (Map ID 4), Parking Lot #30/Betty's Lot (Map ID 5). The project involves improvements to the Pier View Way Bridge and Lifeguard Headquarters, a suite of proposed improvements to the Junior Seau Beach Community Center and Plaza, a range of improvement options for the Junior Seau Amphitheater/Bandshell, and conceptual improvements to Parking Lot #30/Betty's Lot consisting of built elements atop the existing surface parking lot to support a new beachfront park, community recreation classrooms, and a terraced park with multi-purpose landscaping and ramped paths. Four properties were previously recorded and recommended as eligible for the CRHR. Dudek reevaluated these properties under NRHP, CRHR, and City designation criteria as well as integrity requirements. Acting as lead architectural historian, conducted pedestrian surveys and coauthored the technical report and prepared the impacts analysis for the Program EIR. (2021–Present)

**Mira Mesa CPA Historic Context Statement and Focused Reconnaissance Survey, City of San Diego, California.** Dudek prepared a historic context statement identifying the historical themes and associated property types important to the development of Mira Mesa, accompanied by a reconnaissance-level survey report focused on the master-planned residential communities within the Mira Mesa CPA. This study was completed as part of the comprehensive update to the Mira Mesa CPA and Programmatic Environmental Impact Report. While the historic context statement addressed all development themes and property types within the community, the scope of the survey was limited to residential housing within the CPA constructed between 1969 and 1990. Acting as architectural historian, coauthored and completed the historic context statement, the survey document, and all associated archival research efforts. (2020–2022)

**University CPA Historic Context Statement and Focused Reconnaissance Survey, City of San Diego, California.** Dudek prepared a historic context statement identifying the historical themes and associated property types important to the development of the University CPA, accompanied by a reconnaissance-level survey report focused on the master-planned residential communities within the University CPA. This study was completed as part of the comprehensive update to the University CPA and Programmatic Environmental Impact Report. While the historic context statement addressed all development themes and property types within the community, the scope of the survey was limited to residential housing within the CPA constructed between the 1960s and 1990s. Acting as architectural historian, coauthored and completed the historic context statement, the survey document, and all associated archival research efforts. (2020–2022)

**Coronado Citywide Historic Resources Inventory and Historic Context Statement, City of Coronado, California.** Dudek is currently in the process of preparing a historic context statement and historic resources inventory survey for all properties at least 50 years old within City of Coronado limits. Following current professional methodology standards and procedures developed by the California Office of Historic Preservation and the National Park Service, Dudek would develop a detailed historic context statement for the City that identifies and discusses the important themes, patterns of development, property types, and architectural styles prevalent throughout the City.



Dudek would also conduct a reconnaissance-level survey of all properties within City limits that are at least 50 years old to identify individual properties and groupings of properties (i.e., historic districts) with potential for historical significance under City Criterion C (properties that possess distinctive characteristics of an architectural style; are valuable for the study of a type, period, or method of construction; and have not been substantially altered). Acting as architectural historian, authored the historic context statement and conducted reconnaissance-level surveys of properties within City limits. (2019–Present)

**Gilroy Citywide Historic Resources Inventory, City of Gilroy, California.** Dudek completed a citywide historic context statement and historic resources inventory update of the City of Gilroy’s outdated 1986 historic resources inventory. Dudek hosted a public kickoff meeting/outreach session that was well-received by the community, successfully completed a reconnaissance-level survey of over 3,000 properties on time and within budget, and completed a draft citywide historic context statement. Dudek also prepared a Public Guide to Preservation that provided an overview of the City’s existing policies, what it means to live in a designated property/a district contributor, answers to commonly asked questions concerning restrictions on alterations, and clarification of common misconceptions about property owner requirements. Acting as surveyor, utilized Dudek’s architectural survey application to record the features, alterations, and photographs of historic-era buildings throughout the City. Additionally, assisted in the data management and cleanup of the majority of the DPR Forms produced for each of the surveyed buildings. This process included assigning status codes, editing descriptions, choosing an accurate photograph, and adding proper narrative significance. (2020)

**955 Hancock Avenue, City of West Hollywood, California.** Dudek completed a City-compliant Historical Resource Assessment for a single-family residential property located at 955 Hancock Avenue in West Hollywood. The property was built in 1910 and did not appear to have been previously evaluated for historical significance. This study included a pedestrian survey of the property by a qualified architectural historian, building development and archival research, development of an appropriate historic context for the property, and recordation and evaluation of the property for historical significance and integrity in consideration of NRHP, CRHR, and City of West Hollywood Register eligibility requirements. Acting as architectural historian, assisted in the completion of the assessment as the primary writer. (2018)

## Transportation

**Brightline West – Las Vegas to Victor Valley – Reevaluation 3: Built Environment Resources Finding of Effect: Nevada, Federal Railroad Administration, Clark County, Nevada.** Dudek was retained by the Federal Railroad Administration to complete a finding of effects report for a transportation-related development project in Clark County, Nevada. The purpose of the report is to determine if newly proposed changes to the Project would result in impacts to historical resources pursuant to Section 106 of the National Historic Preservation Act (NHPA). Effects considerations include physical impacts, as well as effects to viewshed, and effects caused by noise and vibration as a result of the construction and operation of the Project. Acting as architectural historian, coauthored the report, wrote significance evaluations and building descriptions, completed archival research, and worked with in-house GIS team to develop APE maps for the project. (2025 - Present)

**Brightline West – Cajon Pass – Reevaluation 1: Built Environment Resources Inventory, Eligibility and Effects: California, Federal Railroad Administration, San Bernardino, California.** Dudek was retained by the Federal Railroad Administration to complete an architectural inventory, evaluation, and finding of effects report for a transportation-related development project in San Bernadino County, California. The purpose of the report is to determine if newly proposed changes to the project would result in impacts to historical resources pursuant to Section 106 of the National Historic Preservation Act (NHPA). Acting as architectural historian, coauthored the report, wrote

significance evaluations and building descriptions, completed archival research, and worked with in-house GIS team to develop APE maps for the project. (2025 - Present)

**Palm Avenue Complete Multimodal Corridor Project, CR Associates, Imperial Beach, California.** The Project is approximately 5,711 linear feet includes establishing Class IV protected bike lanes, widening existing sidewalks, installing shade canopy trees, installing ornamental lighting, improving median landscape, replacing median vehicle lighting, constructing curb extensions with directional ramps, and rebuilding alley entrances, driveways, and curb ramps to be Americans with Disabilities Act compliant. Part of a team of architectural historians who, coauthored the report and completed a review of the report. (2025–Ongoing).

**Keller Road/Interstate 215 Interchange Project, California Department of Transportation, Murrieta and Menifee, California.** The project involved constructing a new, full interchange and auxiliary lanes at Interstate 215 and Keller Road in Riverside County. Acted as architectural historian for the project, coauthoring the HRER. Preparation of the report included a site visit, archival research, historic context development of Murrieta and Menifee, building feature descriptions of six historic-era resources, and historical significance evaluations. (2018)

## Water

**Two-Mile Wells Cultural Resources Inventory and Evaluation Report, Lake Arrowhead Community Services District, Lake Arrowhead, California.** Dudek was retained by Lake Arrowhead Community Services District to complete a cultural resources inventory and evaluation report for the Two-Mile Wells Project, which involved construction activities including site preparation, borehole drilling, depth-specific water quality sampling, casing and screen installation, annular seal installation, well development, aquifer testing, disinfection, completion of the well head, and connection of the water wells via pipeline alignments to the Lake Arrowhead Community Services District's existing water lines. The purpose of the report was to determine if the project would impact any historical resources pursuant to CEQA. As an architectural historian, coauthored the report and completed a review of the report. (2024)

**Southern First Aqueduct Structures Rehabilitation Project, San Diego County Water Authority, California.** Dudek conducted a Phase I Cultural Resources Inventory (including both archaeological and built environment) for the Southern First Aqueduct Rehabilitation Project, located along a 21-mile stretch of the First San Diego Aqueduct, east of Interstate 15 from the City of Escondido in the north to the Goodan Ranch/Sycamore Canyon County Preserve west of San Vicente Reservoir. As part of this effort, the San Diego Water Authority applied for a Letter of Permission under its Programmatic Master Plan Permit with the U.S. Army Corps of Engineers (ACOE), pursuant to Section 404 of the Clean Water Act. ACOE is the federal lead agency responsible for overseeing compliance with Section 106 of the NHPA, as this project is exempt from review under CEQA. Acting as architectural historian, coauthored the Phase I Cultural Resources Inventory Report and authored the analysis of potential adverse effects. (2021)

**Historic Context Statement for Reservoirs, City of San Diego Public Utilities Department, California.** Dudek completed a survey and historic context statement for the City's surface water storage system, including 10 dam complexes and the Dulzura Conduit. Dudek also prepared detailed impacts assessments for proposed modification to dams, as required by the Department of Safety of Dams. The project involves evaluation of 10 dam complexes and conduit for historical significance in consideration of NRHP, CRHR, and City designation criteria and integrity requirements. The evaluation required extensive archival research and a pedestrian survey. Acting as architectural historian, evaluated five resources, including the Dulzura Conduit, Upper Otay Dam, Murray Dam, Sutherland Dam, and Miramar Dam. (2018–2020)

**Historical Resources Impacts Assessment for Maintenance on the Morena Dam Spillway, City of San Diego, California.** Acted as the primary author for an impacts assessment of proposed project activities, including maintenance to the Morena Dam, which is considered a historical resource under CEQA and a historic property under Section 106 of the NHPA. (2019)

## Professional Activities

- Meets the Secretary of the Interior’s Professional Qualifications Standards for history and architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.
- Approved to prepare CEQA documents for the County of San Diego for privately initiated projects for historic resources.

## Specialized Training

- Specialized Certificate in CEQA Practice, UC San Diego Extension, 90 hours of study, March 2022.
  - BUSA40739: CEQA, UC San Diego Extension, Summer 2019.
  - ENVR-40008: Writing Effective CEQA Documents, UC San Diego Extension, Winter 2021.
  - ENVR-40010: CEQA in Practice, UC San Diego Extension, Spring 2021.
  - ENVR-40009: Advanced CEQA, UC San Diego Extension, Winter 2022.

## Publications

Frank, N. 2018. “Mid-Century Glass Block: The Colored Patterned and Textured Era.” Master’s Thesis; The School of the Art Institute of Chicago. June 2018.

Frank, N. 2018. “Draft Reconstruction Era Edwardian Flats Historic Context Statement, 1901-1915.” Internal Draft. City and County of San Francisco Planning Department. August 2018.

## Presentations

“An Exploration into Mid-Century Glass Block Design: The Colored, Patterned, and Textured Era,” 2024. Presented at Docomomo U.S. National Symposium. Miami, Florida.

“Mid-Century Glass Block: The Colored Patterned and Textured Era,” 2018. Presented at the Association for Preservation Technology Annual Conference. Buffalo, New York.

“Mid-Century Glass Block: The Colored Patterned and Textured Era,” 2018. Presented at the Association for Preservation Technology Western Great Lakes Chapter and DOCOMOMO U.S./Chicago 2018 Symposium: Preservation Challenges of Modernist Structures. Chicago, Illinois.

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# **Attachment B**

DPR Form

State of California - The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION  
**PRIMARY RECORD**

Primary # P-37-016522

HRI # 112557

Trinomial

NRHP Status Code 2S2/5S2

Other Listings

Review Code

Reviewer

Date

Page 1 of 8 \*Resource Name or #: (Assigned by recorder) Mission Beach Seawall

P1. Other Identifier: Mission Beach Seawall and Boardwalk

\*P2. Location: ☐ Not for Publication ☒ Unrestricted

\*a. County San Diego and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

\*b. USGS 7.5' Quad La Jolla OE W Date 2018 T 25-28N; R 76-77 E of Sec ; San Bernardino B.M.

c. Address City San Diego Zip 92116

d. UTM: (Give more than one for large and/or linear resources) Zone: 11S, 475276.84 mE/3626908.70mN

Zone: 11S, 475276. mE/3626908.70mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)

Northern: 32°47'36.37" N 117°15'21.02" W; Southern: 32°45'38.24" N 117°15'03.99" W

\*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

The seawall comprises a bulkhead, concrete walkway, and lamp posts. The seawall was constructed in three phases. The 1925 section spans .03 miles with a bulkhead comprised of precast reinforced concrete sheet pile walls interlocked continuously. In 1928, three years after the seawall's initial construction, it was expanded north of Ventura Place and south of San Fernando Place. This section spans approximately 2.4-miles with the bulkhead comprised of differently sized precast reinforced concrete sheet pile walls with a continuous interlock. See continuation sheet page 3

\*P3b. Resource Attributes: (List attributes and codes) HP46. Walls/gates/fences.

\*P4. Resources Present: ☐ Building ☒ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



P5b. Description of Photo: (view, date, accession #) View west, 7/20/2021

\*P6. Date Constructed/Age and Source: ☒ Historic ☐ Prehistoric ☐ Both

1925-1968/City of San Diego

\*P7. Owner and Address:

City of San Diego

City Administration Building

202 "C" Street

San Diego, CA 92101

\*P8. Recorded by: (Name, affiliation, and address)

Nicole Frank, Dudek

605 Third Street, Encinitas,

CA 92024

\*P9. Date Recorded: September 1, 2021

\*P10. Survey Type: (Describe)

Intensive

\*P11. Report Citation: (Cite survey report and other sources, or enter "none.")

Nicole Frank and Allison Lyons, Dudek. "Memorandum Re: Mission Beach Seawall and Bulkhead."

Prepared for Dudek, September 2021.

\*Attachments: ☐ NONE ☐ Location Map ☒ Continuation Sheet ☒ Building, Structure, and Object Record

☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record

☐ Artifact Record ☐ Photograph Record ☐ Other (List):

## BUILDING, STRUCTURE, AND OBJECT RECORD

\*Resource Name or # (Assigned by recorder) Mission Beach Seawall \*NRHP Status Code 2S2/5S2

Page 2 of 8

B1. Historic Name: Mission Beach Seawall B2. Common Name: Mission Beach Seawall  
B3. Original Use: Seawall and boardwalk B4. Present Use: Seawall and boardwalk

\*B5. Architectural Style: Not applicable

\*B6. Construction History: (Construction date, alterations, and date of alterations)

1925: Initial construction, 0.3-miles long ; 1928: Extended 2.4 miles north from Ventura Place ; 1968: Extended 1.4 miles beginning at Balboa Court to the southern terminus of the seawall; 1999: Entire existing bulkhead from Pacific Beach Drive to Thomas Avenue was removed and replaced; 2005: Walkway between Liverpool Place and El Carmel removed and replaced; 2006: Walkway between El Carmel Place and Nantaskey Court removed and replaced; 2016: Walkway and seawall replaced from Ventura Place to San Fernando Place

*See continuation sheet page 3*

\*B7. Moved? ☒ No ☐ Yes ☐ Unknown Date: \_\_\_\_\_ Original Location: \_\_\_\_\_

\*B8. Related Features:

None

B9a. Architect: Lincoln Rodgers and F.W. Stevenson b. Builder: Wurster Construction Company

\*B10. Significance: Theme Resort development Area Mission Beach

Period of Significance 1925-1945 Property Type seawall Applicable Criteria A/1/A and C/3/C

(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

Under NRHP, CRHR, HRB Criterion A/1/A, the seawall retains integrity of location, design, setting, feeling, and association. The seawall lacks integrity of materials, and workmanship. Consequently, the seawall maintains the requisite integrity to be listed on the NRHP, CRHR, and HRB under Criterion A/1/A. As such, the seawall maintains integrity under HRB Criterion E. Under NRHP, CRHR, and HRB Criterion C/3/C, the seawall retains integrity of location, design, setting, and association. The seawall has a diminished integrity of workmanship and lacks integrity of materials and feeling. However, the seawall appears to retain sufficient integrity to reflect significance under Criterion C/3/C. As such, the seawall maintains integrity under HRB Criterion E. The recommended California Historical Resource Status Codes for the Mission Beach Seawall are: 2S2 and 5S2. *See continuation sheet page 4*

B11. Additional Resource Attributes: (List attributes and codes)

\*B12. References:

*See continuation sheet page 8.*

B13. Remarks:

\*B14. Evaluator: Nichole Frank, Dudek

\*Date of Evaluation: September 1, 2021

(This space reserved for official comments.)

(Sketch Map with north arrow required.)



(for a larger image, see page 4)



## CONTINUATION SHEET

Page 3 of 8

\*Resource Name or # (Assigned by recorder) Mission Beach Seawall

\*Recorded by: Nicole Frank, Dudek

\*Date September 1, 2021

☐ Continuation ☒ Update

### \*P3a. Description

An addition to the seawall was constructed in 1968. This section spanned approximately .15 miles beginning at Balboa Court and acting as the southern terminus for the seawall. This section is comprised of a continuous reinforced concrete bulkhead that is backfilled with earthen fill. The lamp posts and sections of the bulkhead and walkway are entirely new and not of historic age.

### \*B6. Construction History

*Construction History Overview (see Figure 1, page 4)*

The first section was originally constructed in 1925, which coincided with the development of the Mission Beach Amusement Center (now Belmont Park). This section spanned 0.3-miles between Asbury Court and Balboa Court with the bulkhead comprised of precast reinforced concrete sheet pile walls interlocked continuously. In 2016, this section was restored to its original 1925 appearance, therefore it is entirely new and not of historic age.

In 1928, three years after the seawall's initial construction, it was expanded north of Ventura Place and south of San Fernando Place. This section spanned approximately 2.5-miles with the bulkhead comprised of differently sized precast reinforced concrete sheet pile walls with a continuous interlock. Alterations to this section include informal maintenance such as patches and infill of cracks. In 1989, the concrete walkway was removed and replaced from San Fernando Place to Balboa Court. In 1990, the walkway between Ventura Place and Liverpool Court was replaced. In 1999, the entire existing bulkhead from Pacific Beach Drive to Thomas Avenue was removed and replaced; therefore, the bulkhead in this section is entirely new and not of historic age. In 2005, the walkway between Liverpool Place and El Carmel was removed and replaced. In 2006, the walkway between El Carmel Place and Nantasket Court was removed and replaced.

An addition to the seawall was constructed in 1968. This section spanned approximately .15 miles beginning at Balboa Court and acting as the southern terminus for the seawall. This section is comprised of a continuous reinforced concrete bulkhead that is backfilled with earthen fill.

## CONTINUATION SHEET

Page 4 of 8

\*Resource Name or # (Assigned by recorder) Mission Beach Seawall

\*Recorded by: Nicole Frank, Dudek

\*Date September 1, 2021

☐ Continuation ☒ Update

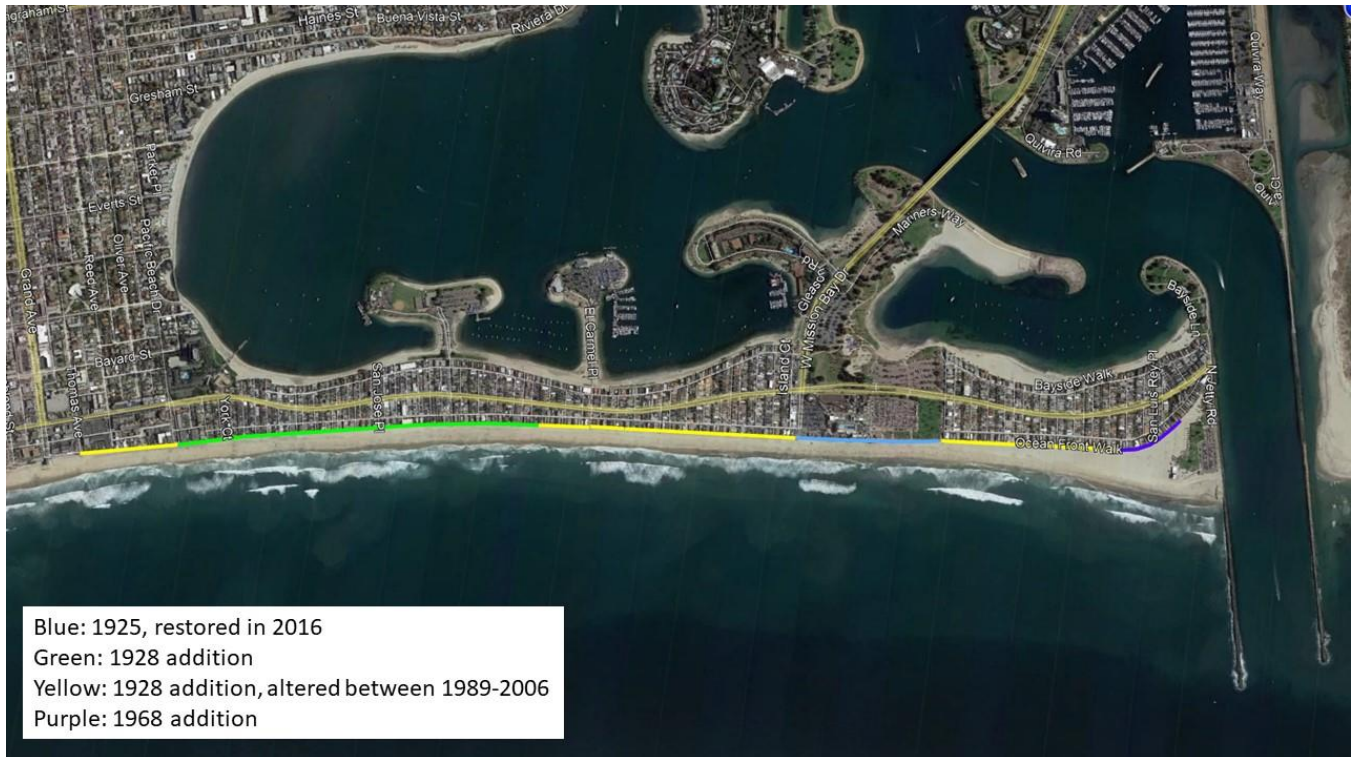


Figure 1: Aerial photo of the seawall with color-coded dates of construction and alterations (Google Earth 2020)

## CONTINUATION SHEET

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\*Resource Name or # (Assigned by recorder) Mission Beach Seawall

\*Recorded by: Nicole Frank, Dudek

\*Date September 1, 2021

☐ Continuation ☒ Update

### \*B10. Significance

The Mission Beach seawall (bulkhead and walkway or boardwalk) was previously evaluated for significance under National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) criteria by Milford Wayne Donaldson in 1997 and again in 2014 by IS Architecture. Donaldson found the seawall eligible for listing in the NRHP and the CRHR under Criteria A/1, B/2, and C/3. IS Architecture found the seawall eligible for listing in the NRHP under Criteria A, B, and C. The two reports did not evaluate the seawall under City of San Diego designation criteria. On September 9, 1997, SHPO Cherilyn Widell concurred with two of the three criteria put forth by Donaldson's 1997 report. SHPO determined that the seawall is eligible for inclusion in the NRHP, at the level of local significance, under Criteria A and C. SHPO did not concur with Donaldson's recommendation for eligibility under Criterion B. The 2014 IS Architecture report stated, "IS Architecture concurs with the chosen National Register (NA) designation criteria as put forth by the City of San Diego Historic Resources staff," this included Criteria A, B, and C despite SHPO's 1997 determination of eligibility for only Criteria A and C.

#### NRHP/CRHR Significance Evaluations

##### NRHP/CRHR Criterion A/1

Dudek reviewed and synthesized all previous arguments as the following summary statement of significance under this Criterion: The seawall is eligible for inclusion on the NRHP and CRHR under Criterion A/1 for its association with the early development of Mission Beach (1914-1915) and its integral part in the award-winning Mission Beach Subdivision Plan, which was honored for their innovation in beach resort planning. Additionally, the seawall retains integrity to be listed on the NRHP/CRHR under Criterion A/1.

##### NRHP/CRHR Criterion B/2

Dudek reviewed and synthesized all previous arguments as the following summary statement of significance under this criterion: The seawall is not eligible for inclusion on the NRHP and CRHR under Criterion B/2 for its association with historically significant individuals. The developer, John D. Spreckels was an important individual to the history of San Diego. Despite this, the seawall, as compared to the other properties associated with his productive life, does not appear to be the property that best illustrated his historic contributions and important achievements. The significance of the seawall architects, Lincoln Rodgers and F.W. Stevenson, and general contractors, the Wurster Construction Company, is best evaluated under Criterion C/3 for their contributions to the design of the seawall. Therefore, the seawall does not appear eligible under NRHP/CRHR Criterion B/2.

##### NRHP/CRHR Criterion C/3

Dudek reviewed and synthesized all previous arguments as the following summary statement of significance under this criterion: The seawall is eligible for inclusion on the NRHP and CRHR under Criterion C/3 for its period and method of construction utilizing tongue and groove pilings, which were unique and innovative for their time. Additionally, the seawall retains integrity to be listed on the NRHP/CRHR under Criterion C/3.

##### NRHP/CRHR Criterion D/4

Dudek reviewed and synthesized all these arguments as the following summary statement of significance under this criterion: There is no evidence to indicate that the seawall is likely to yield any information important in prehistory or history. Additionally, the seawall is not associated with an archaeological site or a known subsurface cultural component. Therefore, it does not appear eligible under NRHP/CRHR Criterion D/4.

#### San Diego Local

##### City of San Diego Historical Resources Board Designation Criteria

For all of the reasons described above, the seawall appears eligible for listing as a historical resource by the City of San Diego Historical Resources Board (HRB) for meeting designation Criteria A, C, and E. Those Criteria are as follows:

## CONTINUATION SHEET

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\*Resource Name or # (Assigned by recorder) Mission Beach Seawall

\*Recorded by: Nicole Frank, Dudek

\*Date September 1, 2021

☐ Continuation ☒ Update

- A. exemplifies or reflects special elements of the City's, a community's, or a neighborhood's, historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping or architectural development;
- C. embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- E. is listed or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historical Preservation Office for listing on the State Register of Historical Resources

The seawall appears eligible under HRB Criteria A, C, and E due to the 1997 determination of eligibility by the SHPO. The SHPO found the seawall eligible for listing on the NRHP under Criteria A and C based on its importance with events that have made a significant contribution to San Diego's history and its period and method of construction. As the seawall has been determined eligible by the National Park Service, it is eligible under HRB Criteria E.

### *Character-Defining Features*

Dudek identified the following as character-defining features of the seawall:

- Location along Ocean Front Walk running parallel to the Pacific Ocean
- Access to the beach from the boardwalk through integrated concrete stairs
- Board form concrete using tongue and groove pilings
- Low profile, allowing pedestrians and homeowners to view the beach
- Uniform light grey color
- Sharp rectangular reliefs evenly spaced out on each panel
- Rectangular scuppers that allow water to drain from the boardwalk

### **Integrity**

#### *Location*

NRHP, CRHR, and HRB Criterion A/1/A: The seawall retains integrity of location under Criterion A/1/A. The seawall is situated in its original location where it was constructed and has not been moved. As such, it retains integrity in its location.

NRHP, CRHR, and HRB Criterion C/3/C: The seawall retains integrity of location under Criterion C/3/C. The seawall is situated in its original location where it was constructed and has not been moved. As such, it retains integrity in its location.

#### *Design*

NRHP, CRHR, and HRB Criterion A/1/A: The seawall retains integrity of design under Criterion A/1. The seawall was constructed as part of the Mission Beach Subdivision Plan and retains its original function to allow pedestrian access to the beach and stop the intrusion of water onto the boardwalk. The conscious decisions made during the original planning of the seawall have been retained.

NRHP, CRHR, and HRB Criterion C/3/C: The seawall retains integrity of design under Criterion C/3/C. The seawall's organization of space, proportion, scale, technology, ornamentation, and materials have been retained. Despite sections of replacement materials, the seawall overall displays the same tongue and groove pilings, which made it unique and innovative for its time. Additionally, the seawall has remained utilitarian in function and design with a lack of ornament and the use of unpainted concrete. While design elements such as the innovative period technique of the tongue and groove piling in the bulkhead were replicated during repairs and replacement, the integrity of workmanship (discussed below) was diminished when these elements were replicated. Many features of the seawall are standard features for modern seawalls but when applied to the original period of construction (1925 and 1928), these features illustrate innovative design technology. The seawall continues to reflect its historic design technologies as well as aesthetics.

## CONTINUATION SHEET

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\*Resource Name or # (Assigned by recorder) Mission Beach Seawall

\*Recorded by: Nicole Frank, Dudek

\*Date September 1, 2021

☐ Continuation ☒ Update

### *Setting*

NRHP, CRHR, and HRB Criterion A/1/A: The seawall retains integrity of setting under Criterion A/1/A. The seawall was originally constructed as an integral part of the 1914-1925 Mission Beach Subdivision Plan, which included the John D. Spreckels Amusement Center. Upon its initial construction, the Amusement Center was bounded by Ventura Place to the north and San Fernando Place to the south and included a bathhouse, dance casino, and concessions with the Pacific Ocean to the direct west. Despite the removal of the Amusement Center's key components including the bathhouse and dance casino, the seawall remains as an uninterrupted protective structure on the Pacific Coast. Additionally, the key spatial relationship between the seawall, Mission Beach, and the Pacific Ocean have been retained. NRHP, CRHR, and HRB Criterion C/3/C: The seawall retains integrity of setting under Criterion C/3/C. The seawall continues to reflect the functions it was intended to serve as a seawall separating the ocean from the buildings along Ocean Front Walk. The seawall retains the essential features of its original physical environment which include the ocean, the beach, the boardwalk, and the buildings along the boardwalk. The retention of these elements allows the seawall to maintain its historic character while also retaining its historic role.

NRHP, CRHR, and HRB Criterion C/3/C: The seawall retains integrity of setting under Criterion C/3/C. The seawall continues to reflect the functions it was intended to serve as a seawall separating the ocean from the buildings along Ocean Front Walk. The seawall retains the essential features of its original physical environment which include the ocean, the beach, the boardwalk, and the buildings along the boardwalk. The retention of these elements allows the seawall to maintain its historic character while also retaining its historic role.

### *Materials*

NRHP, CRHR, and HRB Criterion A/1/A: The seawall does not retain integrity of materials under Criterion A/1/A. The physical elements that were combined during the seawall's initial construction in 1925 and 1928 as part of the Mission Beach Subdivision Plan have not been retained. Multiple alterations, including an extension in 1968, replacement of original materials during the 1990s and 2000s, a complete replacement of the original 1925 seawall in 2016, and the addition of non-original materials over time have affected the seawall's ability to reveal the preferences of those who created it.

NRHP, CRHR, and HRB Criterion C/3/C: The seawall does not retain integrity of materials under Criterion C/3/C. Despite the key exterior material of concrete being retained and the method of construction remaining the same from the seawall's initial period of construction the majority of the physical elements from that period have been altered or replaced. The seawall still reflects the tongue and groove pilings design, but the materials that were originally used to display that innovative design have been lost.

### *Workmanship*

NRHP, CRHR, and HRB Criterion A/1/A: The seawall does not retain integrity of workmanship under Criterion A/1/A. Similar to the integrity of materials, the physical evidence of an artisans' labor and skill in constructing the seawall as part of the Mission Beach Subdivision Plan have not been retained. Most of the workmanship from the seawall's initial construction of 1925 and 1928 has been lost due to alterations and replacements. The addition of non-original materials over time has eliminated the original structure's key feature as a board form concrete structure linked to the early development of the Mission Beach area.

NRHP, CRHR, and HRB Criterion C/3/C: The seawall has a diminished integrity of workmanship under Criterion C/3/C. Only in limited sections does the seawall retain the original physical evidence of artisans' skill in constructing near water-tight joints and a wave deterrent. Over time, alterations have removed sections of original workmanship that reflect the seawall's original period of construction 1925 and 1928. Since portions of the seawall were replaced but not the entire structure, this allows for it to display diminished integrity of workmanship and not a complete loss.

### *Feeling*

## CONTINUATION SHEET

Page 8 of 8

\*Resource Name or # (Assigned by recorder) Mission Beach Seawall

\*Recorded by: Nicole Frank, Dudek

\*Date September 1, 2021

☐ Continuation ☒ Update

NRHP, CRHR, and HRB Criterion A/1/A: The seawall retains integrity of feeling under Criterion A/1/A. The seawall retains the ability to present as an integral part of the 1914-1925 Mission Beach Subdivision Plan, continuing to serve its original function as a seawall allowing for pedestrians to travel along the boardwalk and to keep water from the Pacific Ocean off the walkway. The key physical features when taken together allow the seawall to convey its historic character. These key features include the ocean, the beach, the boardwalk, and the buildings along the boardwalk which remain intact allowing the property to present as a utilitarian structure constructed to aid in recreation and tourism.

NRHP, CRHR, and HRB Criterion C/3/C: The seawall does not retain integrity of feeling under Criterion C/3/C. The seawall has undergone several large-scale alterations including an extension in 1968, replacement of original materials during the 1990s and 2000s, a complete replacement of the original 1925 seawall in 2016, and the addition of non-original materials over time that have affected its ability to express its historic character. The seawall does not possess enough key physical elements which would allow it to present as a structure constructed in the mid to late-1920s.

### Association

NRHP, CRHR, and HRB Criterion A/1/A: The seawall retains integrity of association under Criterion A/1/A. The seawall is sufficiently intact to convey its relationship to the early development of Mission Beach (1914-1915). Additionally, it displays the presence of physical features to convey as an integral part of the award-winning Mission Beach Subdivision Plan, which was honored for its innovation in beach resort planning.

NRHP, CRHR, and HRB Criterion C/3/C: The seawall retains integrity of association under Criterion C/3/C. The seawall is sufficiently intact to convey the unique and innovative tongue and groove piling design, which provided a near water-tight joint. Despite alterations to the seawall, it retains the ability to convey its relationship to this innovative design to an observer. The physical features that convey the seawall's historic character have been retained.

### Summary

Under NRHP, CRHR, HRB Criterion A/1/A, the seawall retains integrity of location, design, feeling, and association. The seawall lacks integrity of setting, materials, and workmanship. Consequently, the seawall maintains the requisite integrity to be listed on the NRHP, CRHR, and HRB under Criterion A/1/A. As such, the seawall maintains integrity under HRB Criterion E.

Under NRHP, CRHR, and HRB Criterion C/3/C, the seawall retains integrity of location, design, setting, and association. The seawall has a diminished integrity of workmanship and lacks integrity of materials and feeling. However, the seawall appears to retain sufficient integrity to reflect significance under Criterion C/3/C. As such, the seawall maintains integrity under HRB Criterion E.

The recommended California Historical Resource Status Codes for the Mission Beach Seawall are:

- 2S2: Individual property determined eligible for NR by a consensus through Section 106 process. Listed in the CR.
- 5S2: Individual property that is eligible for local listing or designation.

### References

- Donaldson, Milford Wayne. *Final Finding of Effect for the Mission Beach Boardwalk Expansion*. SD-04800. August 7, 1998.
- Harris & Associates. *Mission Beach Seawall and Boardwalk Integrity Study, Mission Beach Boardwalk, San Diego, CA*. April 20, 2021.
- Widell, Cherilyn. "Office of Historic Preservation, Department of Parks and Recreation, Letter FHWA970721A," P-37-016522. September 9, 1997.



P-37-016522

CALIFORNIA DEPARTMENT OF TRANSPORTATION  
ARCHITECTURAL INVENTORY/EVALUATION FORM

MAP REFERENCE NO. 1

County - Route - Postmile:

☐ LISTED  
☐ APPEARS ELIGIBLE

☒ DETERMINED ELIGIBLE  
☐ APPEARS INELIGIBLE

IDENTIFICATION

1. Common Name: Mission Beach Seawall and Boardwalk

2. Historic Name:

3. Street or rural address: Ocean Front Walk, Mission Beach

City: San Diego

Zip Code: 92109

County: San Diego

4. Parcel Number:

Present Owner: City of San Diego

Address:

City:

Zip Code:

5. Ownership is: ☒ Public ☐ Private

6. Present Use: Original Use:

DESCRIPTION

7a. Architectural Style: Spanish Colonial Revival

7b. Briefly describe the present PHYSICAL CONDITION of the site or structure and describe any major alterations from its original condition: For more than two miles the seawall and boardwalk are in fair to good condition. Some remedial modifications have been made since their initial construction, but the wall still provides complete protection from the ocean and the 12' boardwalk is in continuous high traffic use.



8. Construction date c. 1925, 1928, 1940, 1968  
Estimated: ☐ Factual: ☒

9. Architect: Byrl Phelps, San Diego City Engineer,  
Lincoln Rogers & F.W. Stevenson, Engineers:  
San Diego City Engineers

10. Builder: Storm & Batts

11. Approx. property size (in feet) 2.3 miles  
Frontage: Depth:

12. Date(s) of enclosed photograph(s):  
21 April 1997

13. Condition: Excellent ( ) Good (x) Fair ( ) Deteriorated ( )

14. Alterations: Extensions, maintenance repairs, concrete resurfacing (north section)

15. Surroundings: (Check more than one if necessary) Open land ( ) Scattered buildings ( ) Densely built-up ( )

Residential (x) Industrial ( ) Commercial (x) Other:

16. Threats to site: None known ( ) Private Development ( ) Zoning ( ) Vandalism (x) Public Works Project ( )  
Other:

17. Is the structure: On its original site? (x) Moved? ( ) Unknown? ( )

18. Related features: Staircase, light standards and concrete boardwalk (contiguous).

## SIGNIFICANCE

19. Briefly state historical and/or architectural importance (include dates, events, and persons associated with the site):

The original 1925 seawall was privately constructed and associated with the John D. Spreckels Amusement Center. After a significant storm event in 1926, another 10,000 LF was added to the original seawall in the similar style in order to protect the residential community. The seawall was an integral part of the 1914-1925 Mission Beach Subdivision Plan that was honored for its innovation in Beach Resort Planning.

In 1916 J.M. Asher, a local businessman and developer, purchased from Spreckels a large block of land in the northern part of the subdivision, now referred to as old Mission Beach. Asher was responsible for some of the first commercial structures being built from the plan; a bathhouse, a bayside pier, a large sea water swimming pool, a children's pool, limited street car service on the old Bayshore line and the tent city. Because this initial development was realized and sustained through World War I, Asher was regarded the "Father of Mission Beach". Despite the promotions and the attractiveness of the site, the subdivision sold only moderately. The tent city was closed down by a newly introduced health code which prohibited non-permanent structures.

San Diego's first large scale amusement center, "Wonderland", was built in the neighboring community of Ocean Beach. However, due to the geographic isolation of Ocean Beach, a competing and highly successful Panama-California Exposition in Balboa Park, and a brutal ocean storm, Wonderland closed in 1916, just three years after it opened. The Mission Beach Amusement Center, in contrast, offered more amenity with great stretches of white sandy beach on both the ocean and baysides. It also promoted a health-based setting distinguished itself from its eastern counterparts. It was easy to exploit the pristine beaches and the Mediterranean climate in a city that had already gained a reputation as a health mecca.

Location Sketch map (draw & label site and surrounding streets, roads, and prominent landmark)

20. Main theme of historic resource: (If more than one is checked, number in order of importance.)

Architecture (x) Arts & Leisure (x)  
Economic/Industrial ( ) Exploration/Settlement ( )  
Government (x) Military ( ) Religion ( )  
Social/Education ( )  
Engineering (x)

21. Sources (List books, documents, surveys, personal interviews and their dates.)

City of San Diego Engineering Maps and Records, 471-L, 539-D, 2184-L, 9205-D.

22. Date form prepared: June 11 1997

By: Wayne Donaldson, FAIA; Eileen Magno

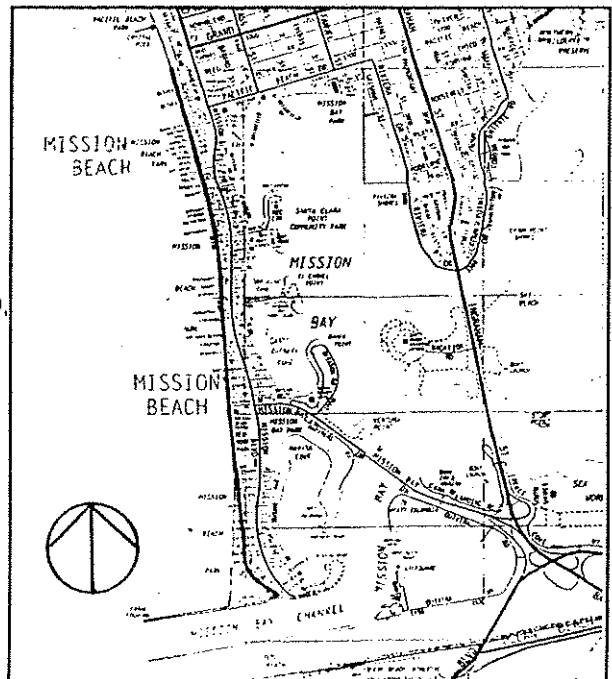
Organization: Architect Milford Wayne Donaldson, FAIA, Inc.

Address: 530 Sixth Avenue

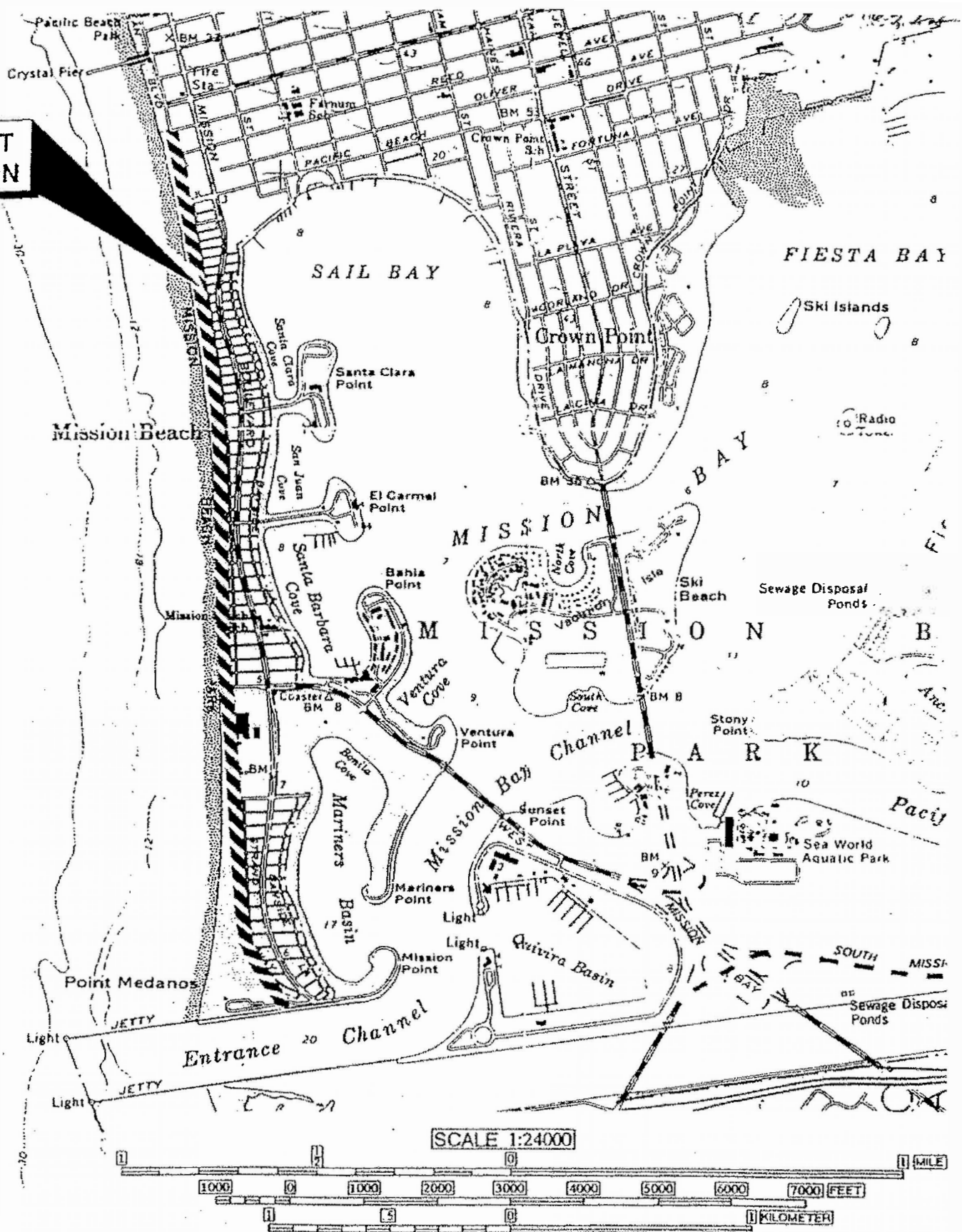
City: San Diego

Zip Code: 92101

Phone: (619) 239-7888



**PROJECT  
LOCATION**



# **CITY OF SAN DIEGO MISSION BEACH BOARDWALK WIDENING PROJECT**

USGS 7.5' LA JOLLA, QUADRANGLE (1967, PHOTOREVISED 1975)

OCEAN FRONT WALK, THOMAS AVENUE TO SOUTH MISSION BEACH JETTY (2.36 MILES)  
COUNTY OF SAN DIEGO, CALIFORNIA  
EXPENDITURE AUTHORIZATION NO. 965100-6ENVREV

## OFFICE OF HISTORIC PRESERVATION

## DEPARTMENT OF PARKS AND RECREATION

942896

NTO 94296-0001

6624

(16) 653-9824



September 9, 1997

FHWA970721A

**RECEIVED**

SEP 12 1997

**FHWA**

Bradley Keazer, Acting Division Administrator  
Federal Highway Administration  
Region Nine, California Division  
980 Ninth Street, Suite 400  
SACRAMENTO CA 95814-2724

Re: Historic Property Survey Report, Mission Beach Boardwalk  
Expansion Project, San Diego, San Diego County.

Dear Mr. Keazer:

Thank you for submitting to our office your July 17, 1997 letter and Historic Property Survey Report (HPSR) regarding the proposed Mission Beach Boardwalk (Boardwalk) Survey Expansion project, San Diego San Diego County. The Boardwalk and adjacent seawall extends from Thomas Avenue on the north, to the South Mission Beach jetty, for a distance of 2.4 miles. The proposed project calls for possible widening of the Boardwalk in either a easterly or westerly direction. There are currently five alternatives being considered for the Boardwalk expansion project. These alternatives are described in detail on Pages 4 through 8 of the HPSR.

You are seeking our comments on your determination of the eligibility of the Boardwalk, seawall, and 177 adjacent properties located within the project Area Of Potential Effect (APE) for inclusion on the National Register of Historic places (NRHP) in accordance with 36 CFR 800, regulations implementing Section 106 of the National Historic Preservation Act. You are also seeking comments on your preliminary determination of the effects the five alternatives appear to have on the historic properties in accordance with the same act. Our review of the submitted documentation leads us to concur with your determination that the Boardwalk and seawall are eligible for inclusion on the NRHP, at the level of local significance, under Criterion A and C as defined in 36 CFR 60.4.

Both the Boardwalk and the seawall have strong associations with the early development of the Mission Beach area during the area's historical period of significance (1914-1945) and were prime components of an award winning landscape design by developer John D. Spreckels. In addition, the Boardwalk and seawall have maintained a high degree of the structural integrity of design, setting, and materials associated with the aforementioned historical period of significance. We also concur with your determination that none of the remaining 177 structures evaluated in the HPSR are eligible for inclusion on the NRHP under any of the criteria established by 36 CFR 60.4. None of the structures have strong associations with significant historical events or

persons, nor do any of the 45 pre-1945 structures retain sufficient architectural integrity to warrant consideration for inclusion on the NRHP.

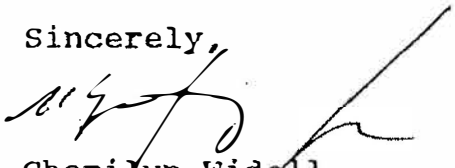
Our preliminary review of the effects of the five alternatives being considered for this project leads us to conclude the following:

- o Design Alternative 1 does appear to have an adverse effect on the historic Boardwalk and seawall;
- o Design Alternative 2 does appear to have an adverse effect on the historic boardwalk and seawall;
- o Design Alternative 3 does not appear to adversely affect the historic Boardwalk and seawall;
- o Design Alternative 4 does not appear to adversely affect the historic Boardwalk and seawall;
- o Design Alternative 5 does not appear to adversely affect the historic Boardwalk and seawall.

These comments are not to be construed as a formal determination of the effects of the proposed project alternatives on historic properties. Such a determination will be forthcoming when a formal selection of a preferred project alternative has been made by the appropriate agencies, and the results of the selection have been forwarded to our office for our review and comment in accordance with guidelines set forth in 36 CFR 800.5.

Thank you again for seeking our comments on your project. If you have any questions, please contact staff historian Clarence Caesar at (916) 653-8902.

Sincerely,



Cheryl Widell  
State Historic Preservation Officer

## Attachment B: DPR form